

January 23, 2013

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
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SUBJECT: Description and Comparative Evaluation of Draft DRECP Alternatives of December 17, 2012, and DRECP Shapefiles of December 20, 2012

Thank you for the opportunity to comment on the subject documents. The California Desert Coalition (CDC) is a nonpartisan, issue advocacy group organized as a committee of The SummerTree Institute, a 501(c)(3) nonprofit corporation.

CDC supports renewable energy production and utilization in California as long as it protects unique and sensitive resources, in particular the California Desert Conservation Area (CDCA), and respects the rights of citizens who live in this conservation area.

CDC focuses on renewable energy issues affecting the Morongo Basin and its surrounding communities. CDC successfully opposed the ill-sited Green Path North transmission line, along with designation of a new utility corridor, proposed by LADWP to be built in undeveloped backcountry and along the viewshed of these high-desert communities. That inappropriate project and utility corridor were strongly opposed by local citizens, whose united voice and committed effort resulted in LADWP withdrawing its Green Path North Project application.

On August 8, 2012, CDC previously submitted comments on the DRECP Alternative Scenarios and Transmission Assumptions of July 25, 2012. In those comments we stated that "The DRECP process should involve some outreach to affected communities. There were no workshops or meetings held in the Morongo Basin area, and its citizens received no correspondence or communication of any kind." This comment does not seem to have been heard, as now the public is presented with a whole new different set of alternatives to comment on, again without any workshop or meeting held in the Morongo Basin so that citizens can understand the highly complex issues that will affect them dramatically. We have had no opportunity to ask questions and become informed in a meaningful way. We again request that a DRECP public meeting be held in the Morongo Basin area.

CDC will not reiterate here the rest of our earlier comments (all still valid) so that we can focus on details of the current set of Alternatives 1 through 6.

Common to all of the current alternatives seems to be a lack of understanding of the fact that there is no approved utility corridor in the Morongo Basin area (even though the Shapefiles for each alternative correctly show the absence of a utility corridor here). And, as mentioned above in the case of the Green Path North Project, the area's citizens are strongly opposed to any future designation of a utility corridor in this area.

A utility corridor, as well as utility-scale energy development, is simply not appropriate in the Morongo Basin's high-desert small towns and communities, which are nestled amongst conserved lands: Joshua Tree National Park, Big Morongo Canyon Preserve, Pioneertown Mountains Preserve, and Bighorn Mountain Wilderness.

Comments by alternative follow. Note that these comments are relative to the Morongo Basin and its surrounding area and use the December 19, 2012, Shapefiles as their point of reference.

Alternative 1

- CDC supports an emphasis on locating renewable energy projects on disturbed lands and on a low resource conflict.
- With respect to DFA designation, this alternative is appropriate in omitting any DFAs in the Morongo Basin. It does, however, include a DFA in the Morongo Basin's surrounding area, i.e., around Lucerne Valley. CDC defers to the residents of Lucerne Valley with respect to this DFA, and CDC supports the comments submitted to the DRECP process by the Lucerne Valley Economic Development Association (LVEDA) on 8/6/12.
- Variance lands should be removed from this alternative. Variance lands leave the area in limbo as to its future. Also, more specifically, it is inappropriate to include variance lands in an area where there is no approved utility corridor; renewable energy generated on these variance lands could not be transported to urban use areas.
- The extensive ACEC proposed all along Hwy. 247 from Yucca Valley to just east of Lucerne Valley and which would connect to the existing Big Morongo Canyon Preserve ACEC is a step forward in conserving important lands.
- CDC supports this alternative's inclusion of the current Big Morongo Canyon Preserve ACEC into the NLCS. We also support the extensive amount of pristine land along Hwy. 62 and Hwy. 247 that would be added to the NLCS in this alternative, but we recommend that in order

to adequately conserve important lands, all of the ACEC lands proposed in this alternative be added to the NLCS instead to provide a higher level of protection.

Alternatives 2 & 4

CDC cannot support Alternative 2 or 4, which are very similar with respect to their impact on the Morongo Basin and surrounding area. Although both of these alternatives purport to be “transmission aligned,” this seems to be a misnomer in that they create DFAs in the Morongo Basin and surrounding area where there is no approved utility corridor and thus no way to deliver renewable energy to urban areas. DFAs should be located only along existing utility corridors, and the number of DFAs created can be reduced by utilizing distributed generation, e.g., placing solar panels on the rooftops of homes and public and commercial structures, as the focus in meeting California’s renewable energy goals.

Alternative 3

This alternative creates even more DFAs in the Morongo Basin than Alternative 2 or 4, even including a large DFA that borders both Big Morongo Canyon Preserve and Joshua Tree National Park and another DFA along Hwy. 247, which DFA is set in the middle of and is surrounded by land that this same alternative proposes be included in the NLCS. Thus CDC opposes this alternative even more strongly than Alternatives 2 and 4. With respect to placing DFAs where there is no approved utility corridor, we have the same objections for this alternative as we expressed under Alternatives 2 and 4 above.

Alternative 5

- This alternative creates the most DFAs in the Morongo Basin of any of the alternatives. It would create economic ruin for our area, which depends on tourism as its main source of income. The gateway to Joshua Tree National Park would become strewn with industrial development, obscuring the area’s magnificent viewshed.
- The DFAs created in this alternative would also sound a death knell for biodiversity, as the DFAs would replace necessary wildlife linkages with industrial development. In the face of climate change, these wildlife linkages are even more important than ever, as they allow biological movement between Joshua Tree National Park and higher elevations in the San Bernardino Mountains to the west.
- As we have continuously pointed out, there is no approved utility corridor in this area, is unlikely to ever be one due to already proven citizen opposition to a corridor, and no reason to place DFAs here where their renewable energy could not be transported to urban areas.

Alternative 6

- Variance lands are not a form of conservation planning, a primary objective of the DRECP. While Alternative 6 adds large amounts of land to the NLCS, the alternative is not acceptable because of the variance lands it strews across the Morongo Basin. These variance lands are even located totally surrounded by the alternative's identified NLCS additions. Seeing as NLCS status would prevent a future utility corridor from being established on the land, placing a renewable energy project where it could not connect to transmission does not make sense.
- This is another alternative that purports to be "transmission aligned," although as already stated, there is no approved utility corridor in the Morongo Basin, and it is unlikely such a corridor could ever be approved in the face of proven local opposition.

Thank you for considering our comments.

Respectfully,

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