



CHINA LAKE ALLIANCE

P.O. Box 2000 Ridgecrest, CA 93556 (760) 375-8331

California Energy Commission

DOCKETED

09-RENEW EO-1

TN # 75069

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February 23, 2015

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-1
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Desert Renewable Energy Conservation Plan (DRECP) and accompanying EIR/EIS

The China Lake Alliance appreciates the opportunity to comment on the subject plan and EIR/EIS.

We are a community-based organization whose mission is to support the Navy at China Lake, and have been doing so for the past 22 years including support for China Lake during Base Realignment and Closure in 1995 and 2005 (BRAC 95 and 05). Our motivation is two-fold. China Lake is an isolated naval installation in the northern Mojave Desert, and the economy of the relatively small surrounding community in the Indian Wells Valley is 86% derived from the Navy. Equally, and even more important to many, the Naval Air Warfare Center and the Naval Air Weapons Station at China Lake have a storied history of immense accomplishment and contribution to our national defense from 1943 to the present, and which is still required today and will be in the future. These two factors have cemented an exceptionally strong bond between the Navy and the community.

Our principal concern with DRECP is that of encroachment on R-2508 restricted use airspace overlying China Lake and Edwards AFB, the unhindered use of which is absolutely essential to the missions of both installations. In BRAC 95 and 05 China Lake was rated as number one in military value among all technical activities in the Navy, and their access to and use of R-2508 were critical to that rating. Should R-2508 experience future encroachment, it would put at risk that number one military value rating should any future BRAC actions be legislated.

Renewable energy generation is the primary source of encroachment in R-2508 with wind turbines being the most significant because of their interference with airborne radars. The southwest quadrant of R-2508 is already heavily encroached with wind turbines, and a forthcoming wind turbine facility at Searchlight, NV, will result in further encroachment in the southeast. Additional wind turbine

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operations contemplated under DRECP pose further encroachment concerns unless fully vetted through the Navy, the Air Force, and equally important local governments.

DRECP intrudes directly on local government land use planning authority by establishment of Development Focus Areas and the Reserve Design Envelope, both of which include private lands within their boundaries. These private lands are subject to land use planning by local government, however DRECP effectively establishes a zoning overlay which local governments must consider in their planning, land use and community development. The final DRECP plan and EIR/EIS need to fully address to the satisfaction of local governments the conflict which is generated in land use planning authority.

DRECP is essentially a state/federal initiative as evidenced by the composition of the Renewable Energy Action Team (REAT) which is leading the plan development. Local governments have been included in plan development, but only in a relatively minor leadership role compared to the state and federal agencies which are leading the development. Progress on a future DRECP requires buy-in from all parties including local governments and that buy-in requires their participation in leadership of the effort.

Sincerely,

Jack Connell
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