

RIVER AHA

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California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
Email:
docket@energy.ca.gov



Subject: RiverAHA's comments on the Desert Renewable Energy Conservation Plan (DRECP).

Dear Commisssioners,

Please remove the Cadiz Valley region from the DRECP's targeted areas for energy development.

On or about May of 2012 the County Board of Supervisors (SBCoBOS) exempted the Cadiz Corporation activities in the East Mojave desert from compliance with the County's Desert Groundwater Management Ordinance, thus depriving the people of San Bernardino County from full environmental review of the Cadiz project water pump and heist project ,and preventing effective monitoring and enforcement against unlawful and/or harmful project activities.

Any energy development in conjunction with the Cadiz Water pump and pipe to Orange County project would enable the Cadiz Corporation to deprive our desert communities of water while serving to enrich there own private corporate body at the expense of the people of the San Bernardino County.

The Department of the Interior and the County of San Bernardino have engaged in a cavalier and irresponsible manner with regard to the protection of cultural and other resources in the region

of Cadiz Valley with special exemptions based upon bogus assertions like the Cadiz Project is a railroad project therefore is exempt from federal review.

If an energy project in the same area is billed as a railroad project because it is constructed on the railroad corridor and built in conjunction with the Cadiz Project and, or for "railroad purpose" no matter how minimal that railroad purpose might be to the total project purpose, then the energy project may be found to be exempt from federal review as well.

RiverAHA objects to the failure of the Department of Interior to comply with the National Historic Preservation Act Section 106 I the area of CADIZ and are against further destruction of prehistoric sites in the area due to either unreliable or the lack of government stewardship in that region. For this reason, we respectfully request that you set aside the Cadiz area.

There are other important reason why energy development in the Cadiz Valley area should not be allowed. The Route 66 Corridor Management plan is currently being developed because of the millions of people from around the world who visit the road or look forward to recreational driving on it in the future. Pristine view sheds from the corridor around Cadiz are important to maintain the unique quality and character of the historic road. Adding new solar and wind facilities as well as the power lines to the view shed would impair these visual qualities. Further, energy development for running Cadiz pummp and pipe project would/could cause further down drafts of an aquifer that is already considered to be over drawn. Subsidence could also occur with these down drafts and cause hazards such as rail road track shifts.

The Cadiz Corporation's so-called "water conservation" project is not a conservation project at all but a water pump and heist project which would drain desert water and transport it through pipelines to Orange County **just as the DRECP is not a "conservation" plan but instead is a development plan and for all intents and purposes, a land and water grab and should be discarded.**

RiverAHA also objects to the DRECP as a flawed plan because it fails to factor key culturally sensitive environmental zones in its selection of development areas and types. Due to their cultural sensitivity, ancient dry lake shorelines are incompatible with solar development yet this is usually where solar project are sited, and then a water heist begins. Water and land heists in the name of solar is unacceptable.

The DRECP is flawed because it does not include an alternative to develop build out at least 50% solar at point of use first. The plan should be discarded and replaced with a plan to provide free solar to all desert area residents and businesses within the DRECP footprint who would all solar to be installed in their already disturbed property including roof tops, roads, right-of-ways and highway medians.

PLEASE USE YOUR POWER and influence to persuade Congress and the Obama Administration and the Department of the Interior through its agents including the Bureau of Land Management (BLM) TO

**CEASE AND DESIST EXPENDITURE OF FEDERAL FUNDS
FOR MORE PLANS TO HEIST PRISTINE DESERT LAND AND WATER**

Like the so-called

"DESERT RENEWABLE ENERGY CONSERVATION PLAN" ("DRECP")

RiverAHA objects to all of the Alternatives as A HUGE WASTE OF PUBLIC FUNDS THAT COULD HAVE BEEN USED TO RETROFIT HOMES WITH FREE SOLAR.

DRECP is not a conservation plan. This is a proposed amendment to the California Desert Conservation Area Plan and moreover it is development plan that would significantly change the character and landscape of the CDCA from pristine and wild to industrial and corporate.

RIVERAHA OBJECTS to the misleading title that causes people who live, work and recreate in the area not to review it carefully. This plan is massive and there has been no public hearings on the plan in the area where RIVER AHA maintains an office and where its employees live. The on line sessions to supposedly inform the public were actually designed to confuse and obfuscate the public with acronyms constantly used and often times speech that was too rapid.

put people to work instead

spend money on WPA-like projects to install

free point of use solar in previously disturbed or used areas

within the DRECP footprint.

Thank you in advance for being courageous and standing up for our non renewable CULTURAL RESOURCES, California and the California Desert.



Ruth Musser-Lopez
Archaeologist, RiverAHA