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DRECP Comments

There are several misleading statements in the document that seem to be politically based rather than science based as stated. First is the claim that alternative energy will play a critical role in the reduction of greenhouse gasses. The document provides no factual data as to how this proposed action will support this opinion. The recent greenhouse modification ‘deal’ with China will prevent any reduction in measurable efforts to facilitate this objective for many years. Additionally, the loss of the natural carbon sink from destroying intact native habitat has not been calculated in the loss of benefit of this proposed action. There must be a comprehensive benefit analysis presented that the public and decision makers can easily understand, supported by scientific data which does not occur in the document.

While there might be industry contributed science directing the placement of solar and wind projects the presentation for the natural elements of the affected environment is lacking meaningful data. The California Deserts are biologically underexplored and the knowledge of presence and distribution of organisms are significantly incomplete. The arrogant premise that the plan will provide significant conservation opportunities for desert natural resources without specific site data is false. The comment “The Draft DRECP’s comprehensive approach is more transparent and predictable and would achieve conservation benefits that could not be achieved using the project-by-project approach currently used to permit renewable energy projects and protect species” is blatantly misleading and wrong. The only way to provide meaningful data for decision making on such a large scale will be to collect specific site information for each location. If properly implemented the use of the current land use plans for the California Desert Conservation Area, the existing environmental law requirements to use cumulative impact analysis to evaluate the scale of impacts is a more transparent method to modify permitting to minimize non-mitigable impacts to the desert ecosystems. The rush to streamline issuance of permits will cause the destruction and loss of the localized resources without knowledge of those

specific losses. Project by project analysis is the only way the decision makers will have adequate knowledge of the effects of their actions to permit the knowing loss and destruction of specific desert resources and possibly undescribed species. Project by project analysis prevents the predetermined expectation that the damage to natural resources in a certain area can be avoided; there are no known economically viable ways to effectively mitigate losses to desert ecosystems. The overreaching claim that desert ecosystems can be mitigated from industrial impacts has little scientific basis to be used as a justification for the plans objectives; in fact the vast scientific evidence is that functional mitigation in desert ecosystems for implemented projects has not been realized. Additionally, recent approvals of industrial scale projects grossly underestimated the impacts to pristine desert ecosystems and the plans approach will provide the decision making bodies with less specific information for each site than was presented for those projects. There are public law requirements that proposed projects are considered for approval only when the true effects of the actions are presented; streamlining and fast tracking industrial scale actions will require more detailed site affects to comply with existing public laws. The DRECP process will provide much less site specific information for the effects of the actions than existing land use plans.

The plan is a clear arbitrary and capricious proposal that will facilitate the unknowing loss of rare species and high quality habitats and its massive length is anything but transparent.

The use of a covered species list will have questionable conservation value for functional biodiversity protection. There are over 200 rare plants as documented by the citizen science group, the California Native Plant Society that are ignored in the evaluation of significant affects to the environment. These plants are a significant part of the desert biodiversity and as the basic producers to support healthy, diverse functioning ecosystems cannot be excluded from analysis, otherwise the proposed action will not provide for the conservation needs in a future with a changing climate.

In a region that has not been effectively surveyed for the presence of plants and animals how can this plan evaluate the compatible siting of industry to provide for the conservation of species and habitats? The microsite evaluation of specific species is a requirement to provide conservation planning for those species. This plan promotes the failure to evaluate that data prior to giving away the critical habitats of the rare desert species the process allegedly professes to protect.

The identification of suitable habitats to protect requires a careful multiyear survey of lands designed to meet those objectives. The plan does not allow for the gathering and analysis of that data prior to the identification of conservation lands. How will any rational individual be able to guarantee conservation of specific resources if those resources remain unknown?

With impending climate change one of the most important priorities should be to protect the deserts from habitat loss not facilitate it.

Your argument for the no action alternative basically states that the various agency conservation efforts that would be in place with the recently approved CDCA amendments such as the West Mojave Plan are meaningless. Assuming that is not your intention you need to clearly present the differences between the huge efforts to craft conservation actions with the CDCA and others and the differences with the DRECP so the agency officials and public will know how poor the previous planning efforts were to protect sensitive resources (the assertion of the text of the no action alternative). The covered species in any of the plans, current DRECP included, fail to identify a mechanism to evaluate the significant effects to the rare species not on the covered species list. The current tactic will undoubtedly result in the elevation of many of the CNPS list species to become eligible for official listing status. The current planning process does not allow the decision makers or the public to understand the level of significance the destructive industrialization that will take place public lands in the deserts.

There are no mitigation measures that have been proven to be effective for damage to rare plant populations, therefore the habitat damage projected will cause effective permanent degradation to those plant populations. The minimum requirement needs to be total inventory of the subject lands to identify avoidance of loss of rare plant habitat and populations.

The massive size of the DRECP precludes an argument that there is not enough space in the document to properly analyze adverse effects to CNPS list rare plants. Public law requires that the decisions are made with all reasonable information analyzed; the DRECP fails to provide that information for rare plants.

You have used language to minimize the capabilities of the existing CDCA conservation efforts to arbitrarily make the DRECP seem like the only solution to affect conservation actions. The document appears to deliberately mislead the reader that the preferred action is superior without meaningful comparisons. Your statement that CESA would occur in an 'ad hoc' manner is a clear attempt to make a determination for the reader. A claim that the conservation of desert resources under the DRECP would be based on a comprehensive desert wide conservation strategy fails to state that the decision to locate the industrial projects will be based in an absence of basic information of the resources on those sites. Approval of the DRECP's preferred alternative will result in the loss of resources that will remain unknown to the decision makers and the public, a major failing of public law. The so called 'ad hoc' approval of projects throughout the desert is a superior alternative and will provide the analysis needed to make informed decisions. It is bad enough that the document is so massive that no one individual can understand the implications of the proposed actions but you have written it with smoke and mirrors to attempt to blind the fact that this type of action is unnecessary to achieve the needs of clean energy production for the future.

Under the no action alternative you continue to bias the document to unjustifiably determine the outcome of the USFWS permitting process making the reader assume the DRECP will produce a more successful outcome for the plans covered species. In fact the wholesale fast tracking

proposed by the DRECP will prevent the crafting of meaningful conservation tactics in a changing environment. The approval of previous large projects has been based on more information on the effects to the environment than the DRECP and there have been major miscalculations of those effects. More water needed, more endangered species affected, other consequences such as bird mortality that have been hugely significant that were not addressed appropriately, none of which has been mitigated to a level of regulatory significance. With the history of the major failings of mitigation attempts for recent projects it would seem logical to maintain project approval to a case by case basis and improve the analysis through increased data gathering and review that would provide for more meaningful conservation than the blanket approval process proposed. You have failed to inform the reader of the document of these options and therefore the document is fatally flawed and needs major revision to allow a reasonable and rational presentation of comparative effects between alternatives. You need to provide evidence for your assumptions not just a proclamation that it is so.

Knowing the unpredictable drought patterns that occur in the desert the only feasible way to obtain base line information regarding the plant diversity is to require a multiyear survey protocol. Again plants are the foundation of healthy functioning ecosystems and should require a more comprehensive treatment. Vegetation work in the deserts has consistently been at a scale that cannot detect the true biodiversity of the area and is not a substitute for onsite surveys for plant diversity.

One has only to review the Ivanpah project to realize that previous permitting hastily done has resulted in less conservation for listed/covered species. Your argument is invalid; you cannot authentically make a statement that this plan will result in better conservation of the desert resources than the existing framework of requirements.

The industrialization of the desert will be a temporary land use that will result in a permanent loss of biodiversity. The arbitrary selection of covered species and statements that these plans with enhance conservation is an unsupportable position. Desert planning has consistently focused on covered species assuming their conservation will provide blanket protection for all the sensitive resources. There are close to 100 plant species that occur in this planning area that fit technical definitions for listing that are completely ignored by this planning process. Without a proper inventory of the plant resources, decisions will be made contrary to public law requirements that decision makers and the public are knowledgeable about the reasonable effects to the human environment.

The fact that the plan area is enormous means that there are unknown consequences by trying to fast track the document. If the preferred alternative in the DRECP is approved there needs to be the ability for site specific surveys to be conducted for significant sensitive plant resources. The current direction for project implementation does not allow for the gathering of the occurrence data and the analysis of affects to those CNPS listed plant species. The determination of mitigation measures might require complete relocation of the project to prevent the need to

elevate many of those rare plants to officially listed status. The document currently fails to provide any recognition or conservation measures for these non 'covered species' or the ecosystem they depend on.

One of the benefits of project by project review would be the use of cumulative impacts to mitigate the loss of rare biological resources. The longer review times to issue take permits will insure a more comprehensive analysis of adverse effects that will arise from the proposed process' ultimate failure to compensate for the massive unknowable effects of project implementation.

The plan fails to consider the realistic advances in technology that will make the current strategy obsolete before the needs of the plan are accomplished. In the interim there will be significant losses of biologically rich lands that will be sacrificed because of short sited objectives. Please include an analysis of this fact so the decision makers can make a determination of approval or denial with this minimum of information.

We are facing a major change in climate where the maintenance of fully functioning intact ecosystems will have a higher public value. One of the largest factors in the increasing atmospheric carbon is the human caused loss of functioning ecosystems. The no action alternative will allow for a longer term analysis of the comparison of benefits between gains resulting from industrial projects and desert ecosystem contribution as a carbon sink. The disruption of the desert ecosystem will not only be diminished as a carbon sink, but current research indicates that the root and soil degradation will result in a continuing increase in atmospheric carbon through the next several decades, functionally reversing the intended purpose of increasing the use of alternative energy production. The no action alternative will allow existing regulatory mechanisms to provide for better conservation measures and allow the siting of energy projects to occur when more and better data will allow more rational location of those industries.

What are the renewable energy and greenhouse gas emission goals of the nation and state? This question is not to ask for a comparison of alternative energy versus fossil fuel derived energy, but to ask for the measured justification for the actions. Where in the document are those calculations to support the first objective of the DRECP?

What measurable difference in the atmospheric carbon will occur if there was a maximum build out of solar and wind projects in the DRECP area of influence? The public and decision making agencies must know the answer to this question to be able to fully evaluate the effect to the human environment from the implementation of the preferred alternative. While the objectives are to produce energy with a smaller carbon footprint the measure of success that implementation will achieve needs to be known. There cannot be an approval to implement vast habitat destruction without justification on the realistic alteration to the atmospheric levels of carbon that

will be achieved. Along with the measurements for reduction of atmospheric carbon, the negative carbon balance from habitat loss must be included in the calculations.

I would like to point out that the State and Federal targets that are driving the DRECP are arbitrary and capricious in that there will be no measurable reduction of atmospheric carbon that will result from the proposed action. When there is a globally concerted effort to manage greenhouse gasses the technology will be more effective and have a better likelihood to achieve success. The public has the right to know what level of atmospheric carbon measurements can be expected to occur from the implementation of the preferred alternative as compared to the no action alternative. How many parts per million reduction can we expect to see measured? Will the implementation of these actions achieve any level of meaningful success? The January 15, 2015 measurement of atmospheric carbon dioxide was 399.92 ppm. The 2010 level was around 385 ppm. Please inform us how the full implementation of the preferred alternative will modify this acceleration. This calculation must include the regional loss of the carbon sink that creosote provides and the thousands of years of carbon root storage that will off gas resulting from the thousands of acres of habitat destruction. There is a likelihood that the preferred alternative will actually end up contributing to the background greenhouse gas problems than being a solution. The public and decision makers must be made aware of this conundrum. I believe there will be an unmeasurable effect on the atmospheric carbon and there will be an unnecessary loss of regional biodiversity in the face of impending climate change if the preferred alternative is adopted. Intact desert ecosystems are the wrong place to achieve a greenhouse gas management solution.

There is no urgent need to finalize the DRECP.

The document is full of unfounded assumptions that do not provide for meaningful analysis of affects.

The level of detail in many of the maps is misleading and would lead the reader to assume that such data is actually available for the entire plan area.

I am curious as to how you arrived at such specific assumptions of preferred alternative conservation benefits without providing extensive, or even simple comparative analysis with the existing land use management. The magical disappearing act of the previously defined conservation areas (DWMA's) is nowhere justified or analyzed.

Without knowing how many of the assumptions were derived the reader cannot really estimate anything. Just because it is written into the document does not make it so. This document is fatally flawed and cannot be used to satisfy public law requiring the decision maker to have base line information to make a ruling.

A recent study found that many vertebrate species would need to evolve 10,000 times faster than they have in the past to adapt to the climate change predicted in the next 100 years. The preferred

alternative will promote the degradation of intact ecosystems need by many rare species to survive in a changing climate and likely complicate their survival.

Two principle reasons the no action alternative is a more desirable alternative are, the advances in technology will reduce the need for such large scale ecosystem altering proposals that will result in lifetime losses of habitats, and the immediate need to produce greenhouse gas reduction in energy production will not have any measurable effects on those greenhouse gases and therefore extra time can be taken to implement measures to modify human generation of those gases.

The document fails to include an alternative where no energy production is needed from the desert regions. Distributed energy production would be more efficient and not require the increase in dependence on grid sprawl. To sluff this comment off as no response necessary there needs to be a consideration of the effects of the action to achieve a meaningful measurable reduction of greenhouse gasses not just the arbitrary goal of alternative energy production goals.

The document is so massive I don't think there are any heads of agencies that can be aware of all the implications of the proposed DRECP. The unfair advantage that the agencies have is the army of minions that can select pieces of the document and brief the boss; the public does not have that luxury and therefore it seems that the amount of time to review the tomb should be increased for many months.

Unlike Congress, you cannot approve the document to find out what is in it, you must be made aware of the specific implications of your actions through the environmental documentation required by CEQA/NEPA.