Board of Supervisors
County of San Bernardino

NEIL DERRY
SUPERVISOR, THIRD DISTRICT

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May 22, 2012

From: Neil Derry, Third District Supervisor
Board of Supervisors
County of San Bernardino
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To: Renewable Energy Action Team
California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW Eo.o1
California Department of Fish and Game
Bureau of Land Management
U.S. Fish and Wildlife Service

Submitted electronically: docket@energy.ca.gov

Re: Desert Renewable Energy Conservation Plan

Ladies and Gentlemen:

Thank you for the opportunity to comment on the DRECP. I represent the Third District in the County of San Bernardino and the plan reflected in the six (6) scenarios will affect my District to a significant degree.

I note that the scenarios start with Number 1, which has the least alternative development in the California Desert, and progress to Numbers 4 through 6, which provide for substantial alternative energy development.

The scenarios are fatally flawed in that they fail to take into account the economic effects of such developments on the tourism business in the desert, the many ancillary businesses which rely on tourism, and the people who live in the desert. I see no economists serving as members of your planning collaboration. The Scenarios are also inadequate in that they fail to take into account the methodology and criteria of the Environmental Protection Agency in planning for solar, wind, geothermal and other forms of alternative energy.

Joshua Tree National Park is in my District and is a major tourism attraction. It attracts approximately 1.4 million visits each year. Despite the worst economic recession since the 30's, visitation from 2008 to 2010 increased, indicating that this Park is an important tourist destination for Californians. Surveys and studies by the University of Idaho indicate that these visitors travel from the following places:

The United States		81%
California	50%	
Washington	5%	
Colorado	3%	
42 states and D.C.	23%	
International		19%
Canada	9%	
Germany	4%	
U.K.	1%	
16 other countries	5%	

Studies by Timm Kroeger and Paula Manalo of Defenders of Wildlife indicate over 7 million recreation visits in the Mojave bioregion in 2003, with obvious much higher numbers currently. It is probably safe to say that visitation is now in excess of 8 million per year. Your studies should deal with this tourism resource in a scientific manner – and not leave it out altogether.

Your analysis fails to demonstrate any understanding of why visitors come to the California Desert and, accordingly, how these alternate renewable energy developments will affect that visitation, and ultimately the recreational tourism economy. The University of Idaho study identified the ratings of the reasons why people visit Joshua Tree National Park:

Views without development	90%
Clean air	89%
Natural quiet, sounds of nature	87%
Desert plants/wildflowers	83%
Native wildlife	81%

What's significant about these figures is that access to native wildlife and views without development, the values that over 80% of visitors are seeking, are often the very things adversely impacted by inappropriately located renewable energy projects. They can disrupt wildlife habitat and corridors, impair scenic viewsheds, and harm air quality. Industrial development on the scale included in the Scenarios will result in a lot of people going elsewhere, or staying home.

An analysis by Daniel Stynes, Ph.D. (professor emeritus of the Department of Community, Agriculture, Recreation & Resources at Michigan State University) measures visitor spending from visits to Joshua Tree National Park. He estimates that the surrounding region (30 mile radius) receives total direct spending effects of $48 million, and secondary effects of $16 million, for a total effect of over $64 million. When one looks at the reasons for visiting the Park, and the effects of his money generation calculations, the surrounding regions will be crippled if that business is seriously impacted.

A recent study of Joshua Tree National Park by the Harvard Kennedy School of Government invites a more complete economic analysis of the costs of the industrial development of the desert. Their study indicates the following:

The Park provides values to users and non-users.

Total economic value includes:

A. Benefits accrued by consumers who directly use the Park; and
B. Benefits that accrue from knowing that the Park exists, even if services are not directly used.

Measurement must include:

A. Direct Use and Passive Use within the Park, and
B. Cooperative Programming - benefits produced by cooperating with partners to extend the benefits of natural and cultural resource conservation and recreation throughout California, the country and the world.

The study identifies the advantages of Joshua Tree National Park:

A. Diverse resources
    a. Desert landscapes
    b. Mountains
    c. Unique geology
B. Educational programs at multiple levels
C. Size
    a. Surrounding cities
    b. Nine Campgrounds
D. Unique location
E. Cultural resources are unique values
F. Recreational opportunities: measured by traditional cost-valuation techniques
G. Research values: many studies of air quality, rare and special status species, recreation use

It approaches the economic values of the Park by:

A. Economic Methodological Foundations
B. Revealed Preference methods (valuation by people based on their economic actions)
C. Travel Cost Method (TCM) - amount people pay to travel to the Park
    a. Zonal Method
    b. Individual travel cost method
D. Hedonic Pricing Method (HPM) - A combination of payments for different qualities:
    a. Value of open space on real estate
    b. Value of ecosystem functions and services
E. An examination of the services provided by NPS operations, assets, and programming
    a. The services provided by the lands, and
    b. The services created through the maintenance and programming connected with these lands
    c. Programmatic values created by NPS outside of Park Boundaries
        i. Funding : grants to protect natural and cultural resources outside of Park boundary (i.e. Land and Water Conservation Fund)
        ii. Coordination and Management
        iii. Technical Expertise
        iv. Organizational Leveraging

DIRECT USE VALUES

A. Production of goods: Intellectual property (research, media)
B. Services:
    a. Ecosystem Services
    b. Climate Regulation
        i. climate regulation
        ii. carbon storage
            1. deserts: 15 tons CO2/hectare/year
            2. forests: 250 tons CO2/hectare/year
    c. Watershed Services
    d. Soil Formation and Erosion Control
    e. Air quality
    f. Biological diversity
    g. Open space
        iii. real estate values
        iv. sightseeing
        v. camping
        vi. climbing
        vii. hunting
        viii. wildlife viewing
        ix. cultural and historic values
    h. Education
        x. Learning
        xi. Increased locus of control effects on school and job performance
    i. Human development for volunteers
C. Passive use values
    a. Existence value: the benefit of knowing that a resource exists
    b. Bequest value: value to individuals of preservation for their heirs
D. Values generated by Cooperative Programming with others

THE VARIOUS SCENARIOS IN THE DRECP INVITE A SERIOUS ECONOMIC ANALYSIS ALONG THE ABOVE LINES IN ORDER TO COMPLY WITH THE LEGALLY REQUIRED PROPER DISCLOSURE OF ALTERNATIVES WHICH REFLECT ECONOMICS VALUES. FOR EXAMPLE, NUMEROUS STUDIES PROVE THAT REAL ESTATE VALUES WHICH ARE NEAR OR ADJACENT TO WILDERNESS HAVE A PREMIUM OF 30% OR MORE. WHAT WILL HAPPEN TO THOSE PREMIUMS IF THEY ARE SUDDENLY NEXT TO A 60,000 ACRE WIND FARM? AND, WHAT ABOUT THE LOSS OF PROPERTY TAX REVENUES FROM THESE DECLINES IN VALUES?

MANAGEMENT ISSUES:

A. Management Capability:

In 2011, the Supplemental Solar PEIS (the solar planning effort for six western states) placed the area from the Coxcomb Mountains at the east end of Joshua Tree National Park to Iron Mountain off-limits to solar development because of sensitive environmental reasons. BLM is the key player in the PEIS. Yet the BLM then proceeded to approve a pre-

application stage authorization, for the analysis and collection of data, for a 60,000+ acre wind development in that same "off-limits" area. It appears that the BLM's wind staff does not know what its solar staff is protecting. And, the BLM just accepted 20 to 30 mining applications within the protected jurisdiction of Joshua Tree National Park. Are the agencies charged with managing the California Desert ($1/5^{th}$ the area of California) under-funded and under-staffed to properly manage these huge planning efforts? It appears to me that the very large administrative costs to implement the DRECP and permanently police its enforcement is likely to be a significant new cost burden on all government agencies.

B. Need to follow EPA Guidelines:

The Environmental Protection Agency "has evaluated more than 11,000 EPA-tracked sites and nearly 15 million acres with potential for developing solar, wind, biomass and geothermal facilities" (EPA "Re-Powering America's Land", and EPA's Clean Energy web page). Accidents, spills, leaks, and past improper handling of hazardous materials and waste have created huge human health risks and environmental damage. These sites degrade economic growth, jobs, and the vitality of our local communities. The only scenario which appears to seriously consider these lands as sites for alternative energy is Scenario 1. Why take land which is significant for environmental health, tourism business development, or agriculture and rob local communities of jobs and economic health? It makes no sense! Jared Blumenthal, EPA's Regional Administrator for the Pacific Southwest, has been quoted in an EPA press release:

> "Tapping sun and wind power at brownfield sites, rooftops, parking lots, and abandoned land could provide untapped gigawatts of clean energy."

These common-sense solutions to our energy and climate change problems should be applied at the DRECP state-wide level, and not just local communities.

C. Scenic Highway Values:

There have been recent serious discussions of creating a National Scenic Highway of the route from Anza Borrego Desert State Park, through Joshua Tree National Park and the Mojave National Preserve, to Death Valley National Park. Such a designation is a recognition of the unspoiled beauty of the area traversed by these highways and would enhance visitor experience. The development scenarios in the DRECP would destroy that experience and hurt the tourism industry.

Jim Andre (highly regarded scientist and director of the University of California's Granite Mountains Desert Research Center) tells us "This area (California Desert) is treasured by scientists throughout the world for its unparalleled pristine quality among deserts, one of the last functional ecosystems left on planet earth." And wildlife biologist Laura Cunningham indicates "This site is rich in life and needs to be preserved, not industrialized." Tourists understand these values and do not want to be surrounded and obstructed by huge wind farms, solar fields and towers.

The DRECP is fatally incomplete by its failure to deal with the above economic values. It is also defective in that it fails to deal with the potential for other methodologies to deal with energy and climate change:

- Conservation technology to reduce energy consumption in our built environments
- Generation of renewable energy on a smaller scale at locations near to the point of use and which do not interfere with other important societal values
- "rooftop" energy generation
- Exhaustive and thoughtful EPA guidelines for distributive generation and the use of degraded and disturbed lands
- Use of feed-in tariffs to expedite distributive alternative energy generation, as has been so successful in Germany

Climate change and energy independence are very important national objectives. If the above measures are not sufficient to meet our long-term renewable energy goals, then **as a last resort** large scale industrial solar plants and wind sites should be located elsewhere. The EPA has identified millions of acres of degraded lands which are suitable for industrial solar and wind development. These degraded lands already offer little carbon sequestration, wildlife habitat, connectivity, and other natural values. Is this data being used?

I am against these large industrial solar and wind projects. In our unique desert environment they are unprecedented and very risky experiments. I will continue to fight for our residents, tourism and related businesses, and millions of visitors from around the world. If these projects are going to be in the California Desert they need to be away from our national parks and areas important to our local economy and quality of life.

Sincerely,

NEIL DERRY
Supervisor, Third District
County of San Bernardino

References (copies available on request):

1. EPA, RE-Powering America's Land Initiative
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3. Jeffrey Lovich and Joshua Ennen, Wildlife Conservation and Solar Energy Development in the Desert Southwest, American Institute of Biological Sciences, University of California Press, December 2011
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5. Francis Choi and Tim Marlowe, Framework for Total Economic Evaluation of National Park Service Operations and Assets, Joshua Tree National Park Total Economic Value Case Study, Harvard Kennedy School of Government, March 20 2012
6. Defenders of Wildlife, Economic Oasis: Revealing the True Value of the Mojave Desert, 2007
7. Defenders of Wildlife, Technical Report by Defenders Conservation Economics, 2007