February 22, 2015

Chris Beale, DRECP Acting Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Gentlemen,

In the 45+ years since my move to Joshua Tree in 1969, I have seen many changes. But none of those changes has been as potentially destructive as the influx of industrial scale solar plants proposed in the current DRECP model.

While federal and state requirements are in place that should protect the native wildlife species and their pristine habitats, they seem relatively easy for big solar to circumvent.

Tourism is our major industry. The desert’s unspoiled beauty attracts visitors from around the world. Joshua Tree National Park estimates that their visitors alone spend over $422 million dollars annually in the surrounding communities, many of which are disadvantaged. Ruining the view-sheds these visitors pass through on their way to the park to construct soon-to-be-outmoded, outdated solar arrays seems very shortsighted.

Then there are tax consequences. Solar installations produce virtually no additional property tax dollars. Since 80% of San Bernardino County is public land, allowing solar on private lands where building almost anything else would result in more tax dollars does not make economic sense. And putting solar installations on public lands breaks a trust with the American people to preserve these lands for future generations.

Also of concern are water and dust. The Cascade solar array used enough water during construction to supply 50 Joshua Tree families with water for a year. Once construction starts and the ‘desert patina’ that holds down the sand and dust is scraped away, you will always have blowing dust and sand so water for dust control will be needed forever.

The fact that the DRECP projects locating plants to generate an arbitrary 20,000 MW of power primarily in the Mojave Desert areas of San Bernardino County shows an appalling lack of appreciation for this vast unspoiled wilderness area. Only someone completely unfamiliar with the desert would presume that that’s okay because “nobody lives there & there’s nothing out there anyway.”

But I live here and I join my voice with my neighbors and friends in requesting that the DRECP rethink it’s assumptions. Please consider alternatives like rooftop solar that 1) won’t destroy this beautiful desert and our quality of life, 2) won’t require new infrastructure and mega-transmission lines and 3) will keep the generated power local.

Thank you for your consideration.

Sincerely,

(Ms) Mickey Luckman
760-366-2964, cell: 760-835-2315
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Response to Comment Letter F106

Mickey Luckman
February 22, 2015

F106-1 Thank you for your introductory comment. No change in the document is required as a result of this comment.

F106-2 The presence of renewable energy development on and around Joshua Tree National Park has been identified as a potential long-term visual impact in the Desert Renewable Energy Conservation Plan (DRECP) Proposed Land Use Plan Amendment (LUPA) and Final Environmental Impact Statement (EIS), Volume IV, Section IV.20, Visual Resources.

F106-3 This comment is not directed toward any specific discussion or the analysis presented in the Draft DRECP and EIR/EIS Chapters III.23 or IV.23 (Socioeconomics and Environmental Justice). This is a general comment or opinion that the Bureau of Land Management (BLM) will consider during its LUPA decision process.

F106-4 Water use and impacts to groundwater are addressed in Chapter IV.6. The effects of dust during construction of renewable energy infrastructure are addressed in Chapter IV.2.

F106-5 The importance of desert pavement is acknowledged in Volume III, Chapter III.4 and Volume IV, Chapter IV.4. The Conservation and Management Actions (CMAs) contain measures to prevent and minimize disturbance of sensitive soils.

F106-6 As described in Chapter I.1, Phase I of the DRECP is the DRECP Proposed LUPA and Final EIS that addresses activities on BLM-administered lands only. See Section I.3.3 for a description of the renewable energy planning process used for the DRECP, which sets the renewable energy and transmission planning context for developing the DRECP Proposed LUPA and Final EIS for BLM-administered lands.

F106-7 The distributed generation alternative does not meet BLM's purpose and need. Distributed generation was considered but not carried forward, as discussed in Volume II, Section II.8.2.1.
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