

The Mojave Desert Land Trust

6393 Sunset Road, Suite 211

Joshua Tree, CA 92252

August 27, 2008

To: RETI Environmental Working Group
Johanna Wald (jwald@nrdc.org)
Carl Zichella (carl.zichella@sierraclub.org)

From: Pat Flanagan, Program Coordinator
Mojave Desert Land Trust

Subject: Comments on Phase 1B Report

Thank you for this opportunity to consider the recently released Interim Draft Phase 1B Report. We are encouraged that the process intends “to provide access to areas which can provide renewable energy most cost effectively and with the least impact to the environment.” We offer the following comments:

1. Areas with Existing Restrictions. ACECs, areas determined to be critical habitat, DWMAAs and MGSCAs should be reclassified as Category 1.

The environmental “costs” and economic costs are incommensurate and the ranking score does not attempt to monetize the proxy environmental “costs.” What are proxy environmental “costs”? Areas with existing restrictions are not just expected to limit potential renewable development, they are intended to limit such development and millions of dollars and thousands of man hours were spent (and are continuing to be spent) to protect these designated lands and the vulnerable species within them. When considering costs we suggest you factor these real economic expenditures into the equations. For instance, disturbance greater than the 1% allowed on DWMAAs not only harms the desert tortoise it destroys the land permanently for the use it was intended. An environmental economist can calculate these real costs over time. A thriving population of protected tortoise in a functioning ecosystem has a dollar value which includes what has been invested in its protection. This dollar value can and should be matched against the economic cost estimated against a CREZ. If that is done, the value to positioning large scale renewable energy facilities on disturbed land, including fallow agricultural land, will become an even better deal. Although all of us believe that the preservation of a species is immeasurable, above cost, there are times when that beautiful ideal hits the marketplace. If you factor in the relative economic costs for each CREZ then it is fair and possible to factor in the dollar costs for the species harmed and the destruction of the natural services, including the ability to absorb greenhouse gases, which an intact desert ecosystem provides, against those costs. The science to determine these costs exist and, we hope, will be used in future analysis.

2. Lands purchased with private funds and donated to the federal government. All lands purchased with private funds and donated to the federal government should be reclassified to Category 1.

These lands are donated to the federal government under agreements stipulating that they be maintained for the values for which they were purchased. This contract obligates The Wildlands Conservancy and The Mojave Desert Land Trust to monitor these contracts for compliance in perpetuity. Not only would use of these lands for energy production and transmission corridors

Phone 760.366.5440 - FAX 760.366.9103 – www.mojavedesertlandtrust.org

The Mojave Desert Land Trust
is a 501(c)(3) public charity

violate the agreements it would seriously weaken the ability of land trusts to carry on their public benefit business, raise funds, and meet their obligations under state and federal tax law.

3. Water Issues. There is an assumption that a desert community of 7,000 people produces enough recycled water to cool a 100 MW solar thermal plant. This assumption may be in error. Most desert communities of 7,000 people are on septic systems and there is no infrastructure for recycling water nor is there any indication that home owners are willing to pay the millions of dollars required to set up sewage systems.
4. Sensitive Areas both within a CREZ and its Buffer Zone. The EWG has determined that lands within 2 miles of a CREZ boundary may be affected by development in the CREZ. It is suggested that 2 miles is a dangerously conservative footprint and should be reconsidered by scientists with experience in the disturbance of desert ecosystems, namely the USGS. Please see http://geography.wr.usgs.gov/news/docs-04/RVDE_FS058-03.pdf for an overview of the Recoverability and Vulnerability of Desert Ecosystems program.
5. Land Disturbance. There should be weight given to the probability of a successful restoration following the decommissioning of a facility at the end of its lifetime. Areas with a medium to high probability should be more heavily weighted. Again, reference the USGS and their studies of desert ecosystems.
6. The RETI is determining the location of large scale renewable energy developments and transmission corridors over extensive areas of the California Desert. The assumption is that only through this technology can we reach our goals to slash greenhouse gas emissions by 80-90% within the next 42 years. This assumption is unproven while granting that some large scale developments are necessary. There should be an equally energetic parallel study on the feasibility of developing enough distributed energy in the coastal and desert cities and communities to meet the requirements of AB32. New technologies and incentives offered in AB1920: the California Solar Surplus Act of 2008 could go a long way toward meeting the Million Solar Roofs Initiative and matching Spain and Germany's installation of 2000MW of PV solar each year.

Thank you for considering these comments.

Pat Flanagan
Program Coordinator