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## **Plenary Group Report**

*Additional submitted attachment is included below.*

January 10, 2017

Chairman Robert B. Weisenmiller  
California Energy Commission  
1516 Ninth St.  
Sacramento, Calif. 95814

President Michael Picker  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, Calif. 94102

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**Re: Renewable Energy Transmission Initiative 2.0 – Plenary Group Report**

Dear Chairman Weisenmiller and President Picker:

We are a coalition made up of the following community groups, businesses, agencies and individuals: Lucerne Valley Economic Development Association (LVEDA), Johnson Valley Improvement Association, Homestead Valley Community Council, Newberry Springs Economic Development Association, Lucerne Valley Market/Hardware, Mojave River Valley Museum, Lair Restoration Consulting, National Public Lands News.com, Alliance for Desert Preservation (“ADP”), Mojave Communities Conservation Collaborative, Friends of Juniper Flats, Brian Hammer, John Smith, Bill Lembright, Jenny Wilder, Richard Selby, George Stone, Gail Stone, Carol Stubblefield, Jean Magee, Jackie Lindgren, Margaret Waite, John Waite, Brad Hicks, Brenda Hicks, Cheryl Hemmendinger, Robert Lien, Ann Connor, Annie Lancaster, Gary Williams, George Merriman, Kathleen Scott and Neville Slade. Together, we represent a broad spectrum of residents, businesses, organizations, recreationists and conservationists in the High Desert of San Bernardino County.

In this letter, we will address deficiencies in the draft Plenary Group Report (the “PGR”) which was presented at a January 3, 2017 workshop put on by the RETI 2.0 Plenary Group, while making reference to and drawing upon some of the points made in a letter sent by ADP, dated August 29, 2016 to Chairman Weisenmiller and President Picker regarding the RETI 2.0 process.

**1. RETI 2.0 Has Failed to Consider the Renewable Energy Priorities of San Bernardino County, and Instead RETI 2.0 Continues to Follow a Draft DRECP Planning Approach That Has Been Discarded by the DRECP Itself.**

ADP’s August 29, 2016 letter noted that RETI 2.0 had failed to consider the renewable energy priorities of San Bernardino County (the “County”), and that RETI 2.0 had opted instead to follow a draft DRECP planning approach that has been discarded by the DRECP itself.

The PGR makes a passing reference to what it calls the County’s “land use preference” for community-oriented renewable energy, and laments that this “preference” cannot be displayed geographically because the County uses a “criteria-based” approach. These statements in the PGR require correction for two very important reasons: (1) the most current draft of the County’s proposed Renewable Energy and Conservation Element (“RECE”) essentially calls for the confinement of utility-scale renewable energy to five limited areas of the County that represent a small subset of what the PGR calls the “Victorville/Barstow TAFE,” based on a February 17, 2016 Resolution of the County’s Board of Supervisors (the “Resolution”);<sup>1</sup> and (2) the RECE strongly emphasizes community-oriented renewables – hence this is far more than a “land use preference” on the County’s part.<sup>2</sup>

The Resolution and the RECE signify a fundamental sea-change in the County’s land use planning approach to renewable energy, and the County’s intent to foster community-oriented solar – and near banishment of grid-oriented utility-scale export renewables -- will dramatically reduce the need for new transmission in the region.

Nevertheless, the so-called “hypothetical study range” for the Victorville/Barstow TAFE, as stated in the PGR, remains exactly where it has always been through this process: an

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<sup>1</sup> A copy of the Resolution was attached to ADP’s August 29, 2016 letter, but the Resolution received no mention in the PGR.

<sup>2</sup> Community-oriented solar is designed to power small adjacent populations, so no new transmission corridors need be opened to accommodate such generation. In stark contrast, utility-scale renewable projects are wholly dependent on an ever-expanding and far-reaching transmission grid.

enormous and unrealistic 5,000 MW, subject only to “best fit, least cost” analysis, in a manner that mimics the worst aspects of the draft DRECP and the DFAs and “general public lands” it identified. Moreover, notwithstanding the County’s stated intent to severely limit new utility-scale projects, the PGR continues to raise the prospect that an influx of such projects in the County will contribute to what the PGR refers to as the “Desert Area Constraint” (“DAC”), and the PGR continues to posit the likelihood that, at some point, further expansion of the transmission grid will be required to cope with the DAC.<sup>3</sup> No mention is made of the fact that new transmission lines would engender even more utility-scale projects, at least on BLM land, which would, in turn, require even more transmission and other measures needed to ameliorate the DAC.

No mention is made in the PGR of a letter that James Ramos, Chairman of the County Board of Supervisors, directed to the California Energy Commission (the “CEC”), dated July 29, 2016 (the “County Letter,” a copy of which was attached to ADP’s August 29, 2016 letter). In his letter, Chairman Ramos took issue with RETI 2.0’s de facto adoption of the draft DRECP, stating that “[w]e are somewhat perplexed by the shift from the DRECP to RETI 2.0.” Here, he is politely, but unmistakably, expressing serious discomfort with the fact that RETI 2.0 has become a continuation of the draft DRECP. Chairman Ramos also reminded the CEC that the County has adopted the Resolution, while noting that the County has never received any substantive response to its stated concerns.

The PGR makes only an oblique and understated reference to the magnitude of governmental and grass-roots opposition in the County to new transmission projects, such as Coolwater-Lugo, by acknowledging that development of new transmission corridors there would be “challenging.” Nevertheless, the Victorville/Barstow TAFE remains firmly fixed in RETI 2.0’s cross-hairs and, reminiscent of the DRECP, the PGR extols the region’s “abundant energy resources,” i.e., its sunshine and sparsely developed lands, and champions utility-scale as being low-cost and cost-competitive across much of the state, without giving real consideration to the concerns and the interests of the people who live, work and recreate in these areas. The PGR makes no attempt to conceal the fact that it “focuses on transmission needs to access and integrate utility-scale renewable energy . . . .”

RETI 2.0’s continued embrace of the draft DRECP approach – and its decision to continuing planning for 5,000 MW of utility-scale in the Victorville/Barstow TAFE -- also ignores the fact that, due to a great deal of criticism from all quarters – not just from the County

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<sup>3</sup> According to the PGR, *but for the DAC* (and a few other specific transmission limits in specific areas), there would be sufficient existing transmission capacity to achieve many, if not all, the system’s obligations through a “business-as-usual” approach.

(the County submitted a letter criticizing the draft DRECP, dated February 20, 2015)<sup>4</sup>, but from many different governmental agencies, NGOs, scientists, community groups and individuals who filed comments and formal protests, raising numerous concerns about the draft DRECP's assumptions, methodology and uncertainty – the draft DRECP was entirely revamped to sever the private lands aspect of the draft DRECP, and to promulgate a DRECP covering BLM lands only. It is cause for great concern, therefore, to find the DFA in the draft DRECP – for “Pinto Lucerne” – resuscitated and repackaged by the RETI 2.0 joint agencies – including the BLM and CEC – as a “TAFAs” for “Victorville/Barstow,” with no acknowledgment of the many objections to the draft DRECP.

Even though the County has repeatedly and unequivocally expressed itself on the subject, RETI 2.0 has not been dissuaded from calling for TAFAs that build on DFA areas as designated in the draft DRECP, all of which was acknowledged in Brian Turner's comments at the July 29, 2016 RETI 2.0 workshop.

In ADP's oral comment at the August 15, 2016 workshop, it questioned why RETI 2.0 continues to adopt an obsolete planning approach from the draft DRECP that has been discarded by the DRECP itself, and that is objected to by the County. None of the RETI 2.0 joint agencies have provided a response to this question. Quite to the contrary, the joint agencies affirmed, at the August 15, 2016 workshop, that they will be soliciting from developers and utilities their level of commercial interest in developing particular areas – which are to be assembled as portfolios<sup>5</sup> – and that RETI 2.0 will be relying on “terrestrial landscape intactness” dataset

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<sup>4</sup> The County's letter clearly stated that the County's priorities included confining utility-scale renewable energy to previously disturbed and contaminated locations, and excluding utility-scale renewable energy from “Apple Valley, unincorporated Apple Valley, Phelan (south of SR 18 between US 395 and the Los Angeles County line), Stoddard Valley, Helendale, Lucerne Valley, Johnson Valley, Newberry Springs and along historically sensitive sections of California Highway 66/ NTH.”

Nevertheless, the “Victorville/Barstow” TAFAs plans for 5,000 MWs on much of the land which the County declared off-limits in its comments to the draft DRECP.

<sup>5</sup> Previously, in the July 21, 2016 RETI 2.0 Webinar, Scott Flint pointed to base maps and “commercial interest” levels as partial explanation for the locations of the TAFAs's. However, a vast majority of these so called “commercial interest” sites and projects have been either rejected by the BLM or the County, or were withdrawn by developers because of robust opposition and significant environmental concerns. In fact, almost all of these proposed projects were eliminated prior to the draft DRECP roll-out in 2015. (This footnote is continued on the next page.)

mapping (“TLI”) to assess where siting of solar would have less biological conflict. In its approach and in the datasets it uses, RETI 2.0 is borrowing directly from the draft DRECP.<sup>6</sup>

The agencies behind the draft DRECP expressly took on the task of balancing renewable energy development against environmental considerations in the California desert. As such, the draft DRECP at least allowed people to see what the competing goals and concerns were. In contrast, RETI 2.0 presents itself as a neutral tool to figure out what transmission needs will arise from renewable energy development, without considering the environmental, social and political factors which are having and will continue to have a major impact on the decisions made by developers, regulators and policy-makers. Thus RETI 2.0 has rendered itself a tool of very limited use. Unfortunately, because it presents itself as much more than that, RETI 2.0 will be used to validate, legitimize, enable and make inevitable large-scale renewable energy development in the very same areas proposed by a draft DRECP document that was tabled because of an outpouring of criticism. The RETI 2.0 agencies can do much better than that. Much better is what the people of California deserve.

We urge that the joint agencies demonstrate that they are really listening by recalibrating the TAFAs, particularly the Victorville/Barstow TAFE, so that they comport with the County's stated vision. RETI 2.0 will then become a more useful instrument for thinking and planning, and some of the dangers described in the immediately preceding paragraph will be ameliorated.

**2. The Practical Effect of RETI 2.0 Will be to Leave an Indelible Mark on the State's Human and Natural Communities. Therefore it is Unrealistic and Dangerously Misleading to Present it as Just a “High Level Visioning Process.”<sup>7</sup>**

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Nevertheless, the PGR states (in Table ES-2) that Victorville/Barstow TAFE has 302 MWs of renewables online, with 344 MWs of “Approved Projects” **and 1,600 MWs in the CAISO queue**. The sponsors of this letter do not have access to the CAISO queue, and hence we urge that RETI 2.0 take a very close look at it in order to determine the extent to which the 1,600 MWs supposedly listed in the queue include defunct projects.

<sup>6</sup> The TLI approach is flawed for many reasons, not the least of which is that it targets for development areas of the desert where dispersed rural populations have successfully coexisted for generations with intact, functioning and irreplaceable natural ecosystems. RETI 2.0's overwhelming focus on TLI also ignores a plethora of critical biological factors, including the presence of documented wildlife corridors, that would preclude utility-scale development in specific areas.

<sup>7</sup> Brian Turner used the quoted phrase to describe RETI 2.0 at the January 3, 2017 Plenary Group Workshop.

RETI 2.0 presents itself as an abstract, conceptual level planning exercise used to gather data and feedback from stakeholders, and to develop a web-based environmental planning model. In that vein, the PGR states that a certain level of mega-wattage has been assigned to each TAFE as a “hypothetical study range” -- representing a “what if” question of potential renewable energy development – solely for the purpose of gathering feedback from stakeholders.

But RETI 2.0 is much more than a “what if” logic exercise. The concepts and conclusions that it embraces and engenders will, sooner or later – and no matter how they’re couched in the PGR -- become *the* reigning planning assumptions in terms of establishing new transmission and utility-scale renewables in this state, and the PGR will be cited in EIR/EISs, along with the DRECP, as supportive of the “purpose and need” for specific future transmission and generation projects.

The DRECP provides a good example of what happens when a massive planning initiative is commenced under a “what if” approach. The DRECP initially portrayed itself as a high level, conceptual planning exercise, deferring consideration of the actual impacts of specific projects. In practice, the DRECP turned out to be far more than an abstract study. The DRECP is couched to become the dominant determinant of renewable energy generation in the state’s desert regions, eclipsing the land use jurisdiction – and the express wishes -- of many local governmental bodies, including the County. Unfortunately, RETI 2.0 has moved in lockstep with the DRECP, as noted in the above-cited letter from Chairman Ramos of the County Board of Supervisors. Ignoring such criticism, the PGR freely acknowledges (at p. 26) that estimates for the TAFAs were guided by existing studies like the DRECP.

The analytical approach followed by RETI 2.0 emphasizes utility-scale as the only viable, cost-effective tool for meeting the state-mandated RPS and GHG reduction goals. The PGR treats distributed energy resources as peripheral, notwithstanding that, as noted in ADP’s August 29, 2016 letter, site-specific distributed generation is rapidly rendering utility-scale and related transmission projects obsolete. This is a serious analytical flaw. For purposes of brevity, we will not repeat what was stated on the subject in ADP’s above-cited letter (although we urge you to re-read it). We will, however, take note of the following forward-looking statements made by Chairman Weisenmiller and President Picker (in a March 14, 2015 *Sacramento Bee* article):

“One thing is for sure – the next few years of electric power will be as different as the past 10 years of renewable energy development was from the past 50 years of fossil fuel power plants. More of the same policies will not do the trick.”

To be consistent with the vision statements cited above – and to avoid more of the same policies that no longer do the trick -- RETI 2.0 must be willing to give serious consideration to the disruptive technological and economic developments which are now permeating the electrical power and transmission landscape. Unfortunately, the PGR takes the old, outmoded

approach.

RETI 2.0 should be giving serious attention to the following question: “what if” its planning concepts become a primary touchstone for energy land use planning for generations to come in this state – what would be the actual effects on our communities, the environment, local governance and the economy? With the answers to that question in mind, and consistent with the principles advocated in this letter and in ADP’s prior correspondence, we urge that RETI 2.0 thoroughly and fundamentally reexamine the approach taken in its PGR.

### **3. The PGR Calls for an Optimal Mix of “Full Deliverability” and “Energy Only.” Nevertheless, RETI 2.0 Remains Primarily Oriented Toward “Full Deliverability.”**

At the September 10, 2015 Joint Agency Workshop, the keynote speaker stated that RETI 2.0 would be more nuanced and vigorous in assessing geographical and technological diversity. This is reflected, at least to some extent, in the PGR, which notes that maximum efficiency in the use of the current transmission system can be achieved by an “optimal mix” of “full deliverability” and “energy only.” This statement suggests that the “energy only” approach may be given a higher priority in transmission planning.

But, so long as RETI 2.0 remains focused on enabling utility-scale renewables throughout the State -- assigning an arbitrary 5,000 MWs of new development to *each* central and southern California TAFE – it will remain primarily and fundamentally oriented toward “full deliverability,” which will unnecessarily increase the call for new and highly expensive transmission infrastructure. According to the presentation materials at that Joint Agency Workshop, \$334 Million of new transmission and upgrades would be required for the “Victorville/Barstow” TAFE alone, and ratepayers would likely have to pay another \$480 Million to revive Coolwater-Lugo.

The PGR also contains alarming cost projections predicated on a “full deliverability” approach, even while acknowledging that “energy only” would *not* require an expanded grid, and even though dynamic scheduling and other procurement arrangements make “energy only” just as viable. As corroborated on a slide at the March 16, 2015 RETI workshop: “there is a growing interest in shifting transmission paradigm from FCDS [full capacity] to energy only (EO),” and that **with EO there would be “[n]o transmission upgrades to ensure deliverability.”** (Emphasis added.) The slide goes on to say that this “[r]eflects a shift in how to think of transmission need: infrastructure is sized to allow delivery of energy rather than capacity” and “[c]ould allow much fuller utilization of existing infrastructure.”

The main impediment to this shifting paradigm, as stated by one speaker at the August 15, 2016 Joint Agency Workshop, is that there aren't a lot of studies concerning the efficacy of the "energy only" approach – he said that he knew of only one such study, concerning the Sacramento River Valley, that did not turn up any red flags with respect to "energy only." That there have not been more "energy only" studies is quite perplexing given the great promise presented by that planning approach and because, according to Attachment 1 to the PUC Energy Division's Staff Paper – entitled "Incorporating Land Use and Environmental Information into the RPS Calculator and Developing and Selecting RPS Calculator Portfolios" – there was to be a track 1 special study facilitating the modeling of "energy only" projects.

President Michael Picker acknowledged, at the August 15, 2016 Joint Agency Workshop, that "energy only" deserves focus, study and concerted attention. He stated that, given that using the "full deliverability" approach would require many millions of dollars in new transmission investment, it was important that decision-makers get information concerning "full deliverability" vs. "energy only," and that thought should be devoted to anticipating related questions, such as how much power can "energy only" deliver with the lowest price tag and what would its curtailment rate be? One participant said that he hoped the next round of 2016-2017 transmission planning would provide more insight into the "energy only" perspective, but it is far from clear that it will be a focal point in that planning process, or whether it will include the "track 1 special study."

Unfortunately, the PGR does not incorporate, or even allude to, any such "energy only" studies.

The PGR acknowledges that building new transmission is not the only tool in the kit, and it notes that transmission constraints can be alleviated without building new lines by using current and emerging technologies -- such as dynamic scheduling and power flow control to direct power away from over-utilized lines, among several others -- but this point deserves a great deal more emphasis and attention in the final document. For instance, while the PGR quantifies the remaining capacity of existing lines in terms of both "full deliverability" and "energy only," it doesn't calculate how much additional capacity could be preserved or created by a meaningful application of the above-referenced technologies. We urge that RETI 2.0 call for such a study and incorporate its results in the final PGR.

If RETI 2.0 is to truly become the visionary process that it has been billed as, then it must, as called for by President Picker, undertake all studies needed to determine the extent to which "energy only" and constraint-alleviating technologies will allow us to meet our renewable energy/GHG goals without any more new transmission. This would represent a bold and lasting legacy for RETI 2.0.

**4. As an Integral Part of the Final PGR, Data Must Be Gathered and Analyzed Concerning the Health and Sustainability of Impacted Groundwater Basins and Regarding Sand Transport Corridors.**

As noted in this coalition's September 24, 2015 letter and in ADP's August 29, 2016 letter, to the degree that RETI 2.0 focuses on utility-scale renewables and transmission projects, baseline data and cumulative impact studies must be obtained in order to make an intelligent assessment as to whether and to what extent such projects might render specific groundwater basins unsustainable and incapable of supporting the current (and projected) needs of the State's businesses and residents. The above-referenced September 24, 2015 letter provided data and expert commentary concerning: (1) the degree to which our desert groundwater basins, among others, are already in serious overdraft; and (2) the fact that no reliable data exists showing how much potable water remains in those basins or as to the point at which over-pumping will surpass their respective "tipping points," i.e., the point where their capacity to act as underground reservoirs collapses.

It was noted, at the August 15, 2016 Joint Agency Workshop, that Kern County had submitted a letter requesting that RETI 2.0 conduct a special study for the purpose of putting together and analyzing map layers identifying over-drafted groundwater basins.

At that workshop, President Picker asked whether, as part of RETI 2.0, data was being gathered about groundwater basin overdrafts. He received no discernable response from staff or agency stakeholders indicating that this critical issue will receive meaningful attention. There was no other discussion regarding groundwater concerns, except Brian Turner's comment that vanishing water tables were opening up land no longer suitable for farming for renewable energy production.

We noted in our above-referenced correspondence that RETI 2.0 cannot afford to be cavalier when it comes to groundwater basins under siege from overuse. Without dependable and unhindered access to natural sub-surface water supplies, desert communities will quickly wither and die, in which case whole regions will de-populate. The issue will grow more pressing until the state-wide drought ends, even as water-consuming renewable projects increase in size – for instance, the proposed Soda Mountain solar project, which was voted down by the County Board of Supervisors on August 23, 2016, would have used (according to estimates provided by the project proponent) approximately 300,000 gallons of water per day for the projected three-year construction period; after that, water would have been required on a regular basis for panel washings.

Nevertheless, the PGR does not meaningfully address the groundwater issue. We urge that it be revised in order to do so, and in a way which responds to the concerns stated in this and our prior correspondence.

We also urge that RETI 2.0 incorporate in the PGR existing studies which reflect where important sand transport corridors are located in our deserts, because large-scale development on or near them will cause severe environmental degradation.

**5. If Any Transmission Constraints Were to Emerge That Could Not Be Alleviated by Other Means, Then the “Last Resort” Alternative Should Be a New Kramer-Llano Corridor.**

Under the circumstances noted in the preceding caption, there are no good reasons for establishing transmission corridors at Kramer-Lugo, Coolwater-Calcite-Lugo or elsewhere in the southeast portion of the County (all of which will be referred to collectively as the “Southeast Options”).

First, the County has clearly stated it does not want new utility-scale renewable generation in the areas that would be served by any of the Southeast Options.

Second, the County has clearly stated that it would more readily accept new utility-scale projects in five areas specified in the Resolution and the RECE that are geographically distant from the Southeast Options.

Third, the Victorville-Barstow TAFE includes parts of Kern County and Inyo County that do not feed into any of the Southeast Options.

Fourth, as the PGR acknowledges in a roundabout way, each of the Southeast Options would engender broad grass-roots opposition within the County.

As the PGR acknowledges, there are a number of methods to ameliorate the so-called Desert Area Constraints which cost much less than new transmission lines and substations, and do not entail the economic, environmental and political difficulties associated with such new transmission facilities. Further, as the PGR indirectly concedes, the magnitude of the DAC is a matter of some speculation, and amelioration of any anticipated constraints may well come from other quarters, including DERs and reduced demand resulting from increasing efficiencies. Therefore, to the extent that it can in good faith be said that the DAC may in the future necessitate new transmission lines and substations, a route for said facilities would need to be identified that does not encounter the problems and opposition noted above.

The best “last resort” transmission line alternative would be a Kramer-Llano route. While such a route would trigger environmental issues and opposition, it would not give rise to any of the four categories of problems identified above.

## 6. Conclusion

The discussions contained in the above-referenced September 24, 2015 and August 29, 2016 letters continue to be relevant to the issues being considered through RETI 2.0, and we urge the joint agencies to re-read and re-consider the points made in them.

In general, utility-scale renewable energy and transmission are not favorable land uses for the County of San Bernardino. We urge that RETI 2.0 guide development toward energy uses that are enlightened, modern, and genuinely a benefit to the people of this State. To that end, we recommend that RETI 2.0 considerably extend the projected January 31, 2017 date for finalizing the PRG. Too much is at stake, and so much remains to be considered, that more time is needed in order to complete the document, and revisions of the magnitude requested in this letter, once completed, should be workshopped and opened up to an additional public comment period.

We greatly appreciate your time in considering all of the foregoing, and we look forward to continuing our vigorous and productive engagement in the RETI 2.0 process.

Very

truly yours,

### **Community Associations, Businesses and Organizations:**

LUCERNE VALLEY ECONOMIC  
DEVELOPMENT ASSOCIATION

JOHNSON VALLEY IMPROVEMENT  
ASSOCIATION

Chuck Bell, President

Betty Munson, Secretary, for  
Joanna Wright, President

Commissioner Robert B. Weisenmiller  
President Michael Picker  
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HOMESTEAD VALLEY COMMUNITY  
COUNCIL

Joanna Wright, President

NEWBERRY SPRINGS ECONOMIC  
DEVELOPMENT ASSOCIATION

Paul Deel, President

LAIR RESTORATION CONSULTING

Ken Lair, Ph.D.

LUCERNE VALLEY MARKET/  
HARDWARE

Linda Gommel, Chief Executive Officer

MOJAVE COMMUNITIES  
CONSERVATION COLLABORATIVE

Lorrie L. Steely, Founder

ALLIANCE FOR DESERT PRESERVATION

Richard Ravana, President

MOJAVE RIVER MUSEUM

Brent Gaddis, President

FRIENDS OF JUNIPER FLATS

Jennifer Wilder, Coordinator

NATIONAL PUBLIC LANDS  
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Sophia Merk, Director

**Individuals:**

Brian Hammer, Analyst and Adjunct Professor  
(resident of Adelanto)

John Smith (resident of Apple Valley)

Bill Lembright (resident of Lucerne Valley)

Jenny Wilder (resident of Apple Valley)

George Stone (resident of San Bernardino  
County)

Gail Stone (resident of San Bernardino  
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Carol Stubblefield (resident of Apple Valley)

Jean Magee (resident of Lucerne Valley)

Jackie Lindgren (resident of Apple Valley)

Richard Selby (resident of Lucerne Valley)

Margaret Waite (resident of Apple Valley)

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Brad Hicks (resident of Lucerne Valley)

Brenda Hicks (resident of Lucerne Valley)

Cheryl Hemmendinger (resident of Apple  
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Gary Williams (resident of Apple Valley)

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Neville Slade (Apple Valley)