



Morongo Valley, Yucca Valley, Joshua Tree, Twentynine Palms, Homestead Valley, Pioneertown

November 14, 2012

TO: California Energy Commission
Dockets Office, MS-4
Docket No.09-RENEW EO-O1
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted electronically: docket@energy.ca.gov

FROM: Joshua Tree Gateway Communities Tourism Committee
of the Morongo Basin Regional Economic Development Consortium
Jerry Mattos, Chair
5592 Oasis Avenue, Twentynine Palms, CA 92277 – jerryfmattos@gmail.com

Re: DESERT RENEWABLE ENERGY CONSERVATION PLAN

Ladies and Gentlemen:

The Morongo Basin Regional Economic Development Consortium was formed over 15 years ago to represent the economic well-being of the gateway communities of Morongo Valley, Yucca Valley, Joshua Tree, Twentynine Palms, Homestead Valley, and their surrounding communities along the northern border of Joshua Tree National Park. In 2011, the consortium's Joshua Tree Gateway Communities Tourism Committee was formed to provide tourism destination marketing for the region. This letter is to state our serious objections to the scenarios raised in the DRECP with respect to the tourism industry in the Mojave Desert.

The scenarios are flawed in the following respects:

- A. The scenarios fail to take into account the economic effects of alternative energy developments on the tourism business in the desert, the many ancillary businesses which rely on tourism, the people who live in the desert, and millions of visitors to the California Desert from around the world.
- B. The Scenarios do not use, or even consider, the solar mapping tool developed by the federal EPA in planning for solar, wind, geothermal and other forms of alternative energy. The EPA urges the selection of abandoned sites, contaminated sites, landfills, and roof-tops as places to locate industrial facilities. It's online mapping tool for such locations has screened approximately 11,000 of such suitable sites.

Tourism and related industries are an important driving force in the Mojave Desert. Studies by scholars indicate an annual economic value to the Mojave Desert in excess of \$1.5 billion.

Professional surveys and studies indicate that this income stream is based upon the following qualities:

1. Wide-open unobstructed view sheds;
2. Desert plants;
3. Native wildlife; and
4. Undisturbed terrain.

Developments included in the scenarios will seriously impact all of those qualities. As a result, the tourism industry will not be able to continue in its present form. It is not just a local asset. Tourists annually travel to the desert from all over the world.

Highly respected scientists consider the California desert to be the best preserved ecosystem in the United States. It is considered among the top 10 such protected ecosystems in the world.

Jeff Lovich, Ph.D., the Deputy Director of the Southwest Biological Science Center of the United States Geological Survey points out the almost complete absence of peer-reviewed science in the design of these solar and wind projects. He states, "Our analysis shows that, on a local scale, so little is known about the effects of (industrial solar developments) on wildlife that extrapolation to larger scales with any degree of confidence is currently limited by an inadequate amount of scientific data." He has called industrial scale solar developments in the California desert: "A giant experiment."

Michael Allen, Ph.D. and Allen McHughen, Ph.D. at the University of California, Riverside point out that industrial alternative energy development in the desert may cause exploitation and depletion of groundwater beyond any expected recovery potential. They also observed that disturbance of soils by energy facilities and transmission for such energy could cause the release of carbon dioxide contained in such soils, which would increase climate change rather than mitigate against it.

These scientists from UCR call for badly needed research in the following areas:

1. sources, recharge, and loss of groundwater from large-scale solar systems;
2. persistence of endangered, threatened, and, unlisted endemic species in current protected areas, and in new areas where habitat is altered from climate and anthropogenic land use change;
3. exotic species migration pathways, competitive abilities and productivity;
4. carbon budgets and net carbon loss from disturbed soil sequestration.

They state: "Unfortunately, many federal and state agencies, as well as several non-government organizations, whose goal is to protect habitats appear to have overlooked previous results suggesting unacceptable levels of "take" for endangered species, and overlooked existing literature addressing net carbon fluxes that would be affected by the proposed solar developments. Nor have they employed state-of-the-art research tools capable of integrating new ecosystem and habitat modeling approaches coupled with carefully collected spatial and temporal data."

They appear to agree with Dr. Lovich that these industrial projects are a giant experiment. The California Desert is a tourism icon around the world and these industrial developments should follow EPA guidelines. It should not be sacrificed for an unproven experiment.

Sincerely,

S/ Jerry F. Mattos, Chair

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Joshua Tree Gateway Communities Tourism Committee
of the Morongo Basin Regional Economic Development Consortium

Attachment: Tourism Economics Commission Recommendations

Copies to:

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REFERENCES (available on request):

1. EPA, RE-Powering America's Land Initiative
2. Michael Allen, Ph.D., Alan McHughen, Ph.D., University of California Riverside, Gaps in Desert Research, Solar Power in the Desert
3. Daniel Stynes, Ph.D., Michigan State University, Contribution of Joshua Tree National Park to Local Economy
4. Jeffrey Lovich, Ph.D. and Joshua Ennen, USGS, Wildlife Conservation and Solar Energy Development in the Desert Southwest, American Institute of Biological Sciences, December 2011
5. Impact of Visitor Spending on the Local Economy (Joshua Tree National Park), National Park Service Natural Resource Report NPS/NRSS/EQD/NRR-2012/511, April 2012
6. 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
7. Defenders of Wildlife, Economic Oasis: Revealing the True Value of the Mojave Desert, 2007
8. Defenders of Wildlife, Technical Report by Defenders Conservation Economics, 2007

TOURISM ECONOMICS COMMISSION

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November 19, 2012

To: Joshua Tree Gateway Communities Tourism Committee of the
Morongo Basin Regional Economic Development Consortium

From: Pau I Smith, Chair
Tourism Economics Commission

The following are the most important tourism areas of the California desert which should be protected from industrial scale alternative energy production. In the Mojave Desert these factors have been identified by economic scholars as significant in contributing in excess of \$1.5 billion in annual economic benefits to businesses in the Desert.

Most of these areas originated with historic Native American travel and trade routes which followed paths where there was water, game and vegetation which supplied food for them. These same attributes generally also provide key lands for wildlife connectivity – thus contributing to the protection of genetic diversity in this most precious ecosystem in the United States.

Many of them also contain significant archaeological areas indicating an important location for spiritual sites of importance to the Native Americans in the past and today. A number of professional documentaries are now in development which emphasize the importance of these places to Native Americans and the impacts from solar and wind development.

VERY IMPORTANT TOURISM AREAS AND ROUTES

(Areas recommended to be excluded from industrial alternative energy production are indicated in miles from designated roads and special places.)

1. Morongo Basin: Hwy 62 From Yucca Valley east to intersection with Hwy 95.
 - Entire area between Marine Base and Joshua Tree National Park
 - Entire area between Cleghorn Lakes Wilderness and Joshua National Park
 - 4 miles on each side of Highway 62 from Sheephole Valley Wilderness to Highway 95
2. Utah Trail in Twentynine Palms from Joshua Tree National Park to Amboy Road
 - 1 mile on each side of Utah Trail
3. Amboy Road to Amboy
 - 4 miles on each side of Amboy Road from Cleghorn Lakes Wilderness to Amboy and Hwy 66
4. Hwy 66 to Hwy 40
 - 4 miles on each side of Hwy 66.
5. Kelbaker Road to Mojave National Preserve
 - 4 miles on each side of Kelbaker Road
6. Kelbaker Road from Mojave National Preserve to Baker
 - 4 miles on each side of road
7. Hwy 127 from Baker to Death Valley Junction
 - 6 miles on each side of road
8. Hwy 247 from Yucca Valley to Lucerne
 - 4 miles on each side of road
9. Hwy 247 from Lucerne to a point 2 miles south of Barstow
 - 4 miles on each side of road
10. Hwy 58, from a point 2 miles west of Barstow to Hwy 395
 - 4 miles on each side of road
11. Hwy 395 from Kramer Junction to Hwy 14
 - 4 miles on each side of road
12. Hwy 395 (from junction with Hwy 14) to Bishop
 - 4 miles on each side of road
13. Hwy 14 from Lancaster to junction with Hwy 395
 - 4 miles on each side of road
14. Hwy 86 from junction with Hwy 10 to a point 4 miles north of El Centro

- 4 miles on each side of road
15. Hwy 78 from intersection with Hwy 86 to Anza Borrego State Park
6 miles on each side of road
16. Pinto Basin Road from Hwy 10 to Joshua Tree National Park
10 miles on each side of road
17. 10 miles distant from the boundaries surrounding
- Joshua Tree National Park,
 - the Mojave National Preserve,
 - Death Valley National Park,
 - Red Rock Canyon State Park
 - Anza Borrego Desert State Park
 - Mitchell Caverns State Park
 - Blyth intaglios
 - Indian Pass Wilderness in southeastern Imperial County
 - Corn Springs
 - Antelope Valley Poppy Preserve
 - Surprise Canyon in the Panamint Mountains
 - Amorgosa River
 - Owens Lake
 - Little Lake
 - Juan Batista De Anza National Historic Trail
 - Old Spanish National Historic Trail
18. Route 66 from Amboy to a point 3 miles southeast of Barstow
4 miles from the road

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TOURISM ECONOMICS COMMISSION

A commission of tourism business owners, community leaders, tourism dependent businesses, interested tourism experts, and scholars from UCSC, UCLA and USC concerned about forgotten and ignored public planning issues affecting the Desert. tourismecon.com