

Paul, Patricia@Energy

From: e-filinghelp@Energy
Sent: Friday, October 02, 2015 10:03 AM
To: Energy - Docket Optical System
Subject: FW: October 1 joint EC/SLC meeting Phase I, 61,000/5,600 acre state schools/federal Land Exchange Transaction SLC-BLM MOI



-----Original Message-----

From: Michael Garabedian [mailto:michaelgarabedian@earthlink.net]
Sent: Wednesday, September 30, 2015 11:16 PM
To: Lucchesi, Jennifer@SLC; Oggins, Cy@SLC; Brown, Dave@SLC; Bugsch, Brian@SLC; DeLeon, Jennifer@SLC; Porter, Jim@SLC
Cc: e-filinghelp@Energy
Subject: October 1 joint EC/SLC meeting Phase I, 61,000/5,600 acre state schools/federal Land Exchange Transaction SLC-BLM MOI

To the California State Lands Commission and Energy Commission:

Methinks this proposed land exchange demonstrates DRECP's failure to engage minimally adequately with affected human communities, with agencies implementing or affected by the DRECP, with project area descriptions, with environmental disclosure, with science, and with Biological Soil Crusts.

1. DRECP is a failed state planning effort.

DRECP fairly recently touted 40 or so DRECP meetings on the plan without recognizing that this documents an embarrassing absence of regional planning know how. My touchstone is the process used to develop the 1975 California Coastal Plan for 1,000-plus miles of our coast and the community by community process that went into it. The paperless-proud Energy Commission abstains from getting draft plans to for affected areas to people in the affected communities followed by meetings. The two plan meetings I went to had no copies of local area planning or the Executive Summary to hand out, though I understand that DRECP meetings where the Energy Commission Public Adviser was present had Executive Summaries.

The SLC needs to develop its own land exchange public involvement process to prepare item like this before it gets on the SLC agenda. National Parks (here, e.g. with Joshua Tree National Park in three directions), communities (e.g. Lucern Valley), and the public including people who know the area well need a heads up with e-mail notification and involvement long before items like this are on SLC agendas.

2. I find no SLC report about the project sites and how they were chosen. This parallels DRECP's unexplained renewable energy designations. The agenda item assumes that the knowledgeable community and others are familiar with the SLC and its processes including its land exchange processes.

3. Reasons for the absence of CEQA and NEPA environmental disclosure need to be stated. When and how environmental impacts will be disclosed and mitigated needs to be described. If there is does not take place, this would contradict the DRECP commitment to assure that environmental disclosure happens in DRECP implementation.

4. The DRECP's failure to use and apply minimally necessary science conflicts with existing SLC efforts and goals to use and apply science. I believe that DRECP will remain bereft of science because contracting for and incorporating science

do not seem to be on the Energy Commission/DRECP agenda, and BLM is radically understaffed. Two different independent science review panels flunked DRECP. Tacked on scientific review panels did not lead to the use of necessary science, and it will not work for DRECP implementation. Science must be incorporated into the SLC process.

5. If DRECP ever had protection of the ecology of the Mojave Desert ecosystem as a goal, it doesn't now. DRECP in effect assiduously avoids a number of fields of ecology, for example food webs between mountain ranges and their basins. On the project location identification level project developers and BLM are not known for starting out with ecologists on board. It is before projects are located and proposed that the ecological sciences need to be bought to bear. DRECP doesn't mandate this critical science at any stage for the Mojave as a whole or for its sub-ecosystems. There is nothing evident or in the staff report that suggests that SLC used ecology or other science in developing Phase 1.

6. The DRECP's failure to put Biological Soil Crusts (BSCs) up front in the plan with a dominant role is an inexplicable absence of science. Key components of BSC's deserve recognition not only for their role on land and at sea to oxygenate our atmosphere a couple billion years ago, but also for their existing role in greenhouse gas sequestration, making airborne nutrients available to vegetation, prevention of wind erosion, and so on. BSC's from the Nevada Border to the coastal scrub should not be destroyed, but need to be recognized and managed by the SLC for their valuable role.

BSCs reveal that the idea of disturbed land renewable energy development is being employed too broadly because some BSC elements can establish rather quickly after disturbance. For example, picking up broken puzzle-like pieces in disturbed sandy areas may reveal tiny dangling root-like strands with grains of earth hanging on them: this is colonizing BSC.

The DRECP does not serve the purpose it is being relied upon for in land exchange purposes.

No obstacles should exist to SLC stewarding arid lands while it carries out its school education land mandates.

Michael Garabedian, Co-founder
Committee for 245 Million Acres
B.S. Forestry and Conservation
3437 Myrtle Avenue, Suite 400
North Highlands CA 95660
916-719-7296

Note: This e-mail is pending submission to the Energy Commission for docketing.