

The Mojave Desert Land Trust

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Joshua Tree, CA 92252

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Dear RETI Stakeholders Steering Committee Members:

The mission of Mojave Desert Land Trust (MDLT) is to protect the Mojave Desert ecosystem and its cultural and scenic resources through land acquisition, stewardship, public education and participation. The Land Trust comments and advises on projects that threaten or appear to threaten the desert ecosystem.

The Land Trust supports the development of renewable energy in California to meet the emission reduction goals in AB 32. However, the LADWP Green Path North project has made us acutely aware that transmission projects planned without early and adequate environmental screening, respect for private conservation lands and cultural resources, and input from community stakeholders will only move forward under vigorous opposition. This is not productive when the need to offset carbon emissions is urgent.

We appreciate this opportunity to comment on the Black & Veatch RETI Phase 1A Draft Report and offer the following comments.

1. We are disappointed that this process is proceeding so fast. One week is not adequate time for stakeholders to review and respond to this lengthy report. In addition, only one week is planned for Black and Veatch to incorporate comments. This seems insufficient and promises mistakes. Attention to stakeholder concerns upfront will save time in the long run and produce a better outcome.
2. The lack of environmental screening is disappointing. It is analogous to designing an offshore oil drilling rig without considering the ocean where the rig will be operating. The Center for Biological Diversity is completing a map of the California Desert Conservation Area with GIS data layers for protected areas as well as critical habitat, unusual plant assemblages, fire zones, wilderness, wilderness study areas and more. We are hopeful that you will accept this map and incorporate this data to more accurately screen for appropriate generation and transmission sites.
3. The various branches of the military are currently engaged in adjusting their boundaries and/or acquiring buffer lands to protect from encroachment. This information is available, at least generally, and should be acquired and included.
4. We recommend that lands protected in private preserves as well as those lands that were acquired from private funds then donated to the government receive the same recognition and protection as agency preserved lands.
5. We recommend that both known and suspected high density cultural resources be listed as resources to be avoided. Consideration is only being given to religious sites, which is too narrow and exclusive.
6. The ranking of “renewable energy zones” (CREZs) must include environmental factors and the environment be given equal consideration with economic and other factors.
7. CREZs should focus on previously disturbed desert land such as closed dumps, abandoned military bases, and abandoned agricultural fields. Consideration should be given to the distance from existing transmission lines.
8. While there are two environmental members on the RETI Steering Committee there are no physical or biological scientists providing expertise to this initiative. The engineering side of this project is changing rapidly but it will always remain far less complex than the desert ecosystem on which

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projects will be sited. Scientists at the USGS Menlo Park office have a long engagement in an “interdisciplinary approach to understanding the physical and biological processes that influence the vulnerability of the desert ecosystem to disturbance and its ability to recover.” <http://mojave.usgs.gov/rvde/>) The Recovery and Vulnerability of Desert Ecosystems (RVDE) Program was initiated to “conduct basic scientific research on ecological processes within the Mojave Desert ecosystem and to use this knowledge to provide land managers with scientific understanding and tools needed to conserve and restore threatened desert landscapes.” (Same website as above). RETI should invite a RVDE scientist on to the steering committee.

Again, as a Mojave Desert stakeholder we appreciate this opportunity to comment on the Phase 1A Draft Report and look forward to reviewing and commenting on the next phase.

Claudia Sall, President
Mojave Desert Land Trust