

Thank you for your comment, Christine Carraher.

The comment tracking number that has been assigned to your comment is SolarM60196.

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Solar Energy Development PEIS
Comment ID: SolarM60196

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Attachment: Solar PEIS Scoping Comments Carraher 09 13 2009.doc

Comment Submitted:

Please see Comments attached as file "Solar PEIS Scoping Comments Carraher 09 13 2009". If Comments fail to transmit, please contact me. Thank you.

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September 13, 2009

Solar Energy PEIS Scoping
<http://solareis.anl.gov/involve/comments/index.cfm>

Delivered via electronic mail

**Re: Scoping Comments on the Solar Energy Development Programmatic
Environmental Impact Statement**

To Whom It May Concern:

I appreciate the opportunity to comment on the Solar Energy Development Programmatic Environmental Impact Statement (PEIS).

I am a 17-year full-time resident of Wonder Valley in San Bernardino County, California. I own five acres, a well, a home, and an art studio in a vintage cabin north of Amboy Road between Godwin and Gammel. I work both as an artist and as a medical transcriptionist, telecommuting from my home. My community of Wonder Valley and the Dale Basin is specifically included in the lands being analyzed for solar energy development.

I am concerned that industrial-scale solar development of the desert imposes an undue burden on desert communities, threatens to destroy and damage desert ecosystems, and is not economically or scientifically justifiable in the face of better alternatives, mainly dispersed rooftop solar generation in the areas of load, as well as conservation. I further am concerned about the potential to destroy a unique culture and community in Wonder Valley and the Dale Basin.

Below are General comments on the scope of the PEIS, followed by comments specifically addressing potential material and nonmaterial impacts on the Wonder Valley/Dale Basin community.

GENERAL COMMENTS

1. The PEIS should include consultation with Native American tribal governments to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance.

2. The PEIS should study the impacts of increased vehicular traffic and congestion on desert communities, environmental resources, road infrastructure, and public safety during both construction and operational phases of solar and transmission development.
3. The PEIS should study the impacts of worker populations on sensitive desert resources during both construction and operational phases of solar and transmission development.
4. The PEIS should study the impacts on resources that would follow from the introduction of new routes, in view of the known problems caused by off-road vehicle activity and the “invitation” effect of new routes.
5. The PEIS should study impacts on limited water resources and the effects of competition with desert communities, as well as biological communities, for those resources.
6. The PEIS needs to include evaluation of the cumulative and long-term effects of the Project in light of concurrent proposed expansion of the 29 Palms Marine Corps Air-Ground Combat Center; numerous wind projects and geothermal projects; “Route 66” Monument; and Cadiz Land Company water project.
7. The PEIS needs to consider how the desert communities’ own energy needs will or will not be served by these projects.
8. The PEIS must thoroughly analyze the socioeconomic, security, and environmental effects of remote installations versus locally distributed power and consider alternatives that focus renewable energy development close to the load centers. The impacts and benefits of a comprehensive program involving rooftop solar across the developed Southwest, as well as additional potential energy alternatives, must also be thoroughly analyzed and considered. To single out the desert and its communities to bear the brunt of providing energy for the urban areas is an ENVIRONMENTAL JUSTICE issue. To demand sacrifice only of the desert areas and not the load areas is not acceptable!
9. Areas that have already been degraded should be prioritized for consideration for solar and transmission development. No public lands that are basically still relatively undisturbed should be considered for solar energy or transmission use until all degraded lands have been utilized.
10. Removed from any consideration for solar and transmission development should be all protected lands, such as national and state parks, monuments, and preserves; environmentally significant areas such as Designated Wildlife Management Areas and Areas of Critical Environmental Concern; and lands with significant environmental resource potential such as Wilderness Study Areas, other lands with wilderness characteristics, and areas that are under consideration as potential wildlife corridors.
11. The PEIS must include a programmatic evaluation of cumulative impacts to Endangered and Listed species, especially the Desert Tortoise.
12. The PEIS must study the potential of construction and operational phases to introduce or encourage invasive vegetation, including *Brassica tournefortii* or Saharan Mustard, not just at project locations but throughout the desert areas, as vehicles are one of the biggest culprits for spreading invasives.

COMMENTS SPECIFIC TO WONDER VALLEY AND THE DALE BASIN

The community of Wonder Valley and the Dale Basin was formed in intimate relationship with its desert setting. The area is a sort of tidal zone, where the residential interfaces with wilderness at the edge of civilization. The setting and its natural resources, including the broad expanse and its peace, quiet, and visual aesthetics, are intrinsic to the history, identity, and cultural and socioeconomic character and well-being of this community and its residents. Deterioration of or encroachment upon these resources would remove the meaning, heart, and viability of a unique community that has survived in the margins and continues to make a unique contribution to the larger culture of California and the world.

POTENTIAL IMPACTS

The Programmatic Environmental Impact Statement must thoroughly analyze potential economic, material, and nonmaterial impacts on the Wonder Valley/Dale Basin community.

The construction and operation of solar and transmission facilities would bring increased noise, dust and other air-borne pollutants, light pollution, loss of quality viewshed, and other impacts on the quality of life for our residents and quality of experience for the visitors, guests, and clients who come to the Dale Basin for a unique experience of beauty and peace and upon whom many of our residents depend for income. These effects must be measured in the analysis.

Deterioration of desert viewshed and open space and other natural resources would mean loss of identity, livelihood, and investment for the residents of Wonder Valley and the Dale Basin. The area depends economically on location- and resource-reliant industries such as mining and farming; tourism; vacation rentals; location shooting for film, television, and advertising; recreation, both motorized and nonmotorized; and other cultural activities such as art, historical, and spiritual tours and retreats. The area also relies on the aesthetic and environmental quality of its setting to attract today's increasingly mobile workforce, which has become less geographically tethered and can choose where they live. (I myself was able to choose Wonder Valley because of the geographic independence offered by my digital-based trade.) Retirees are also a significant part of our community who can choose where they live based on natural amenities and appeal. Therefore, the area's property values depend on these amenities and that appeal. A diminishment in the quality of the desert setting and resources means jobs, income, and property investment directly lost and future potential thrown away for the Wonder Valley/Dale Basin community. The PEIS must analyze potential socioeconomic impacts to the area that might be caused by deterioration of the quality of the setting and other effects of the Project.

The PEIS further must include a thorough survey of culturally and historically significant resources and sites as well as mining/freighting and archaeological/tribal routes and sites and analyze potential impacts. Wonder Valley and the Dale Basin were roamed by the Serrano, Chemehuevi, and Cahuilla peoples, and its early American history is connected to the Oasis of Mara and Twentynine Palms, mining and ranching activities, and the early homesteading movement of wounded World War I veterans. In 1888 two freight lines run by muleskinners

such as Sabathy crossed the area serving the robust mining industry, and the Dale-Amboy Stageline was used in the early 1900s. There is still much to be learned about the early history of this fascinating area, and it is important that resources not be destroyed before they can be surveyed and preserved for future generations.

AN EXCEPTIONAL RESOURCE: THE SMALL-TRACT HOMESTEADS

The PEIS must include a thorough analysis of potential impacts on Wonder Valley and the Dale Basin as a unique community shaped by the historic 1938 Small-Tract Homestead Act.

Contemporary Wonder Valley and the Dale Basin are visually characterized by two prominent features: The immensity of the natural desert landscape, and the presence of numerous scattered small homestead cabins, in varying states of repair. The cabins are a source of constant curiosity on the part of passers-through, who frequently stop by the Fire Station to ask a version of the perennial query, “What are all those old shacks out there?”

Wonder Valley developed as part of the Small-Tract Homestead Act of 1938, an attempt by the Federal Government to bring residents into the Mojave Desert in which five-acre parcels of land were given to individuals who agreed to build a small residential structure and meet other minor requirements. It is those small structures, whether whole, refurbished, or in ghostly disrepair, that provoke such curiosity and attention today and form the nuclear framework of the community.

Wonder Valley is largely intact as a Small-Tract homestead community. The role of the homestead heritage in shaping the community cannot be overstated, and the cultural and historical significance of this heritage is only recently becoming recognized. Little has changed since the following appeared as one of numerous passages on the movement in various issues of *The Desert Magazine* (1954):

Passage of the Small Tract Act has opened vast areas of land, not for profit or exploitation, but for folks who like to build with their own hands, and who are thrilled by the challenge of creating a home of their own...These homesteads are for people who delight in watching the moon rise over purpled hills, for those who would call the stars by name, and who love the peace that is found only in remote places.

The appeal remains. Today, the five-acre homesteads have become the basis of a special edge-culture built upon a combination of resourcefulness, creativity, determination, and diversity that is increasingly rare in the monotonous suburban landscapes of California. The population spans a remarkable spectrum of class and interests. Whether as recreational cabins used by generations, showcases refurbished by artists, retreats for spiritual seekers, resorts for frazzled urbanites, or refuges for the invalid or the person on fixed income, the homestead cabins have bound together a remarkably diverse population. The historically low real estate prices have continued to allow many of the less-privileged to attain their “little bit of heaven”, or at least an affordable roof over their head, an opportunity for home-ownership that essentially cannot be duplicated elsewhere in California. The variety of the population and the economic, social, and

civic systems its members have devised to survive are a unique expression of modern American culture and a living face of history.

It is critical to keep in mind that the glue that binds this community is the combination of the homestead heritage and the natural desert expanse within which it sits. Both are fundamental for its survival as an identifiable entity. Therefore, the Project must be analyzed as an Environmental Justice issue, with a unique, irreplaceable, lower-income population at risk.

The cabins have architectural significance as a class, with the characteristic “jackrabbit” cabin tailored to meet government requirements and put up almost overnight by such landmark enterprises as Homestead Builders, as well as by many local independent contractors. As well, many cabins were and continue to be unique personal creations of the original homesteaders and their followers, including a notable number of single women as documented in contemporaneous issues of *The Desert Magazine*.

Potential Project impacts also need to be evaluated in light of clear eligibility on the part of both individual homesteads and the entire Wonder Valley community under Section 106 of the National Historic Preservation Act:

- It is associated with an historic event.
- It includes historic structures, the homestead cabins, that were created as a result of this historic act and which remain for the most part architecturally intact.
- The entire community may be eligible as historic under Section 106 as there has been very little alteration to its architectural, physical, and historic integrity since it was founded as a Homestead Community.

As well, the community meets several criteria for consideration for the State of California Register of Historical Places:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation (Criterion 4).

RESOURCES AT RISK

The artists, homesteads, and cultural traditions, products, and events of Wonder Valley and the Dale Basin have been featured in a variety of publications, including locally such as *The Sun Runner* and *The Desert Sun* and nationally such as the *Los Angeles Times* and the *New York Times*. Despite this repeated exposure, there is a persistent public and institutional view that there is “nothing” in the desert, including in the local Study Area.

Contrary to that view, below are some of the resources, events, and traditions that are an intrinsic part of the fabric of the Dale Basin communities, all elements that are intimately tied to and dependent upon the natural resources of their desert setting and, at the same time, are economic generators for the area. These elements contribute to the cultural, visual resource, and socioeconomic life and health of the community and could all potentially be adversely affected by the effects of the Project. They must be considered within the PEIS analysis of impacts.

- The Poste Homestead Historical and Natural Area (Chadwick south of Amboy) contains the adobe ruins of a 1923 homestead occupied by local historic figures David and Anna Poste, owners and operators of the Virginia Dale Mine. The area is of sufficient historical and environmental significance to be the target of a BLM Public Lands Day Volunteer clean-up in 2009, as well as preservation efforts by the Twentynine Palms Historical Society, the Morongo Basin Conservation Association, and the Mojave Desert Land Trust.
- The historic Neugebauer Adobe on Blower north of Amboy, dating from 1939 and still occupied by the original family.
- The Fire Station on Amboy Road, long a center of community life, was originally a State of California Agricultural Inspection Station built in 1960. There are currently plans to create a historical mural on the wall of the Station featuring famed muleskinner Sabathy, who ran a freight line in Wonder Valley servicing Dale Mine a hundred years ago.
- The innovative local “tinkerbelle” telephone system that connected the far-flung homesteads with buried wire that can still be found.
- The Desert Electric Cooperative, Inc. (Amboy at Gammel). This original power provider was a critical factor in the development of the Small-Tract communities across the Basin. The Mid-Century-style building still stands as a landmark and is currently used as a retreat center.
- “Jackrabbit Homestead: Tracing the Small Tract Act in the Southern California Landscape, 1938-2008”, a multimedia project by Kim Stringfellow. Included: A book of fine-art photographs and text on the homestead history of Wonder Valley, to be published in 2009 by Center for American Places as third in the series, “Center Books on the American West.” Also, a “Web-based multimedia presentation featuring a downloadable car audio tour exploring the cultural legacy of the Small Tract Act. Stories from this underrepresented regional history will be told through the voices of local residents, historians, and area artists—many of whom reside in reclaimed historic cabins and use the structures as inspiration for their creative work”; sponsored by the Twentynine Palms Historical Society Museum and supported by a Stories grant from the California Council of the Humanities.
- Wonder Valley Institute of Contemporary Art, located in a vintage cabin on Amboy Road at Sheephole Pass, had its inaugural exhibition in fall 2008 as part of the California Biennial and “seeks to nurture creativity across a range of disciplines by sponsoring imaginative projects on site and throughout the desert area. The tranquil, remote location provides for a fertile home where established and emerging artists can discover new creative paths expanding beyond the confines of the studio and gallery walls.... WVICA will eventually serve as a multi-functional space including a library, exhibition gallery and performance space.”

- Wonder Valley Arts/Fi-Lox-See Gallery and The Glass Outhouse Art Gallery, both exhibiting the work of Wonder Valley artists.
- Wonder Valley is a highly popular destination during the annual Open Studio Art Tours, sponsored by the Morongo Basin Cultural Arts Council and providing a major source of income for area artists.
- The Beauty Bubble Hair and Beauty Museum (Godwin south of Amboy), a unique venue and collection as featured in major publications such as the *New York Times*.
- Poplight, an ongoing project involving regular nighttime abstract video projection on a semi-abandoned cabin off the salt flats near Amboy, by Wonder Valley artist Helena Bongartz.
- High Desert Test Sites, acclaimed annual site-specific experimental art event organized by prominent designer Andrea Zittel and numerous volunteers and including both local and internationally known artists.
- The Palms, a family-owned restaurant and bar that is a local tradition for music and other community cultural events, including Ben Vaughn's Wonder Valley Music Festival series and the popular open-mic nights (see *Press Enterprise* http://www.pe.com/lifestyles/stories/PE_Fea_Daily_D_hootenanny03.24906ce.html#). The Palms is a regular stop on international motorcycle tours and has been used as a location for numerous film, video, and fashion shoots.
- The 2008 Wonder Valley Homestead Cabin Festival, which explored through the arts the legacy of the Small-Tract Homestead Act in two exhibitions and related events. Featured were visual and performing artists who have made the homestead cabins a major subject of their work, as well as a "Show 'n Tell" that was open to anyone and brought together a sharing across the diverse population over the feature they most share in common, their homesteads and their homestead way of life. The Festival and the cabins as a cultural force are documented at <http://homesteadcabin.wordpress.com/>. As well, the Festival was featured in the *Dune Magazine* (Palm Springs) Architectural issue, which positioned the article (see <http://www.jackadandy.net/magicgroove/magicgroove/DuneMagazineFeb08.htm>) opposite its centerpiece on iconic architectural photographer Julius Shulman, the man who put Mid Century Modern architecture on the cultural map:

“It’s with a sense of aesthetic-historic juxtaposition, and a bit of mischief, that we’ve placed our story about the cabins adjacent to writer Lydia Kremer’s beautifully illustrated feature on renowned architectural photographer Julius Shulman. The subjects of these two articles aren’t so mutually exclusive: Both are observing 70-year anniversaries, and they’ve contributed substantially in their respective ways to local culture. It’s worth noting that some folks have taken to remodeling their old High Desert homesteads in the Mid-Century Modern style exalted by Shulman’s brilliant Palm Springs record. The desert may be a study in contrasts, but its underlying interrelationships and shared influences keep it fascinating.”
 - Dean Lamanna, Executive Editor, *Dune Magazine*

- “The Road to Wonder Valley”, a film series by Massif Pictures currently in production and profiling artists of Wonder Valley’s robust and diverse community as intrinsic parts of their desert setting.
- The uniqueness of area qualities and amenities continues to make it a popular location for film and advertising. Past films range all the way from commercial B-grade thriller “Route 666” with Lou Diamond Phillips; to “Palms” by German artist John Bock, supported by REDCAT/CalArts, The Andy Warhol Foundation for the Visual Arts, and The Nimoy Foundation.

CONCLUSION

The community of Wonder Valley and the Dale Basin is a special culture based in an interaction with a wild world, where little infrastructure is provided, independence and resourcefulness are prized, and support systems have been devised unique to the area and its geographical and built circumstances. This culture has made and is continuing to make unique contributions to our world. Large-scale solar and transmission projects have the potential to destroy this culture as well as the local economy and therefore the community, most especially because of its potential to adversely impact the desert setting upon which the culture and economy depends, and the Project must be evaluated in this light.

As an artist who has both specifically sought out and whose creative work is inspired and enabled by this desert setting, my living is in part dependent upon the specific qualities of this desert setting. The deterioration of those qualities would have an ultimately terminal effect on my ability to live and work in my home and studio in Wonder Valley.

Further, industrial-scale solar development of the desert has the distinct potential to impose an undue burden on desert communities and destroy and damage desert ecosystems. Finally, such development is not economically or scientifically justifiable in the face of better alternatives, mainly dispersed rooftop solar generation in the areas of load, as well as conservation.

Thank you again for the opportunity to comment. I am submitting these comments electronically as an attachment via the Public Comment Form at <http://solareis.anl.gov/involve/comments/index.cfm>. Please include me on the mailing list for all future communications regarding the PEIS. Postal communication may be sent to the above street address and electronic communication to magicgroove@gmail.com. If disk copies of documents are made available I request an opportunity to receive those rather than being left to depend on Website access, as like many in this rural area I am restricted to dial-up service.

Sincerely,

Christine Carragher