

Thank you for your comment, Donna Charpied.

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Solar Energy Development PEIS
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Comment Submitted:

CITIZENS FOR THE CHUCKWALLA VALLEY

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"DON'T WASTE THE DESERT"

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September 14, 2009

Via Internet : <http://solareis.anl.gov/involve/comments/index.cfm>

RE: PEIS, Solar Energy Development

To Whom It May Concern,

The Citizens for the Chuckwalla Valley ("CCV"), a grass-roots organization made up of residents of Eagle Mountain/Desert Center, Native Americans, and local environmental activists, was formed in 1990 to prevent the World's largest garbage dump from being built across the street from the Eagle Mountain elementary school, and on the doorstep of Joshua Tree National Park. We have since expanded our mission to include other potentially damaging proposals and actively participate in the decision making process for proposals that include water storage projects, power generating projects, and other projects that have the potential to harm desert communities and Joshua Tree National Park.

The plans for a Programmatic Environmental Impact Statement (PEIS) appear to be fast tracking the release of certain, environmentally sensitive public lands and opening them to solar energy development. The Bureau of Land Management (BLM) and Department of Energy (DOE) need to consider the consequences of freeing up so much public land for only one use. This whole process needs to move at a slower pace in order to identify issues and impacts that will arise if this land is developed. Please consider the following issues:

The potential for specific negative impacts to each of the 24 study areas should be clearly explained. The maps fail to identify any local issues for the regions involved. These would include:

- Degradation of water resources from concentrated solar power
- Degradation of air quality
- Impacts to visual resources
- Impacts to flora and fauna
- Impacts to Federal/State Threatened and Endangered Species

- Impacts to cultural sites

- Impacts to Native American values
- Impacts to private property values
- Limiting access to public lands
- The BLM and DOE should be scheduling public scoping meetings for communities near each of the 24 areas that are being considered for this proposal.
- An Environmental Impact Statement should be written for each one of the 24 tracts of land considered in this proposal.

We incorporate, as though fully contained herein, the comments submitted by the Alliance for Responsible Energy Policy ("AREP"), <http://www.allianceforresponsibleenergypolicy.com> and the comments submitted by the Basin and Range Watch, <http://www.basinandrangewatch.org>. Our comments will focus on the siting of projects in the Chuckwalla Valley located in eastern Riverside County, California.

A complete analysis needs to be conducted on the cumulative impacts from all past, present and foreseeable future projects in the Chuckwalla Valley. The Department of the Interior ("DOI"), and the DOE is guilty of violating environmental justice laws by continuing to site and approve environmentally harmful projects in Eagle Mountain/Desert Center. There is a wholesale assault on this area by energy/utility companies, garbage/sewage mongers, and mercenaries.

We will begin with a little background. Eagle Mountain/Desert Center is located about 50 miles east of Indio and about 50 miles west of Blythe. It is a community that is surrounded like a horseshoe by Joshua Tree National Park Wilderness, and targeted for some of the most unsustainable boondoggles to roll down I - 10. Proposed projects will degrade air and water quality, deplete underground aquifer, increase global warming, result in an irretrievable commitment of natural resources, and negatively impact the Crown Jewel of our desert, Joshua Tree National Park.

In 1936, Joshua Tree (JoTr) National Monument was established by Presidential proclamation, to protect and preserve the area's historic, prehistoric, and scientific features, including the natural resources of the Colorado and Mojave deserts. In 1976 JoTr was given federal wilderness designation. In 1977 it received Class I Wilderness airshed status. In 1984, it was designated a World Biosphere reserve. In 1994, JoTr's status as a nationally significant area was reaffirmed by Congress when they designated it a National Park and added 234,000 acres to the Park and designated an additional 163,000 acres as wilderness.

From 1987 until present residents, desert activists, grassroots organizations, and national environmental organizations worked together to prevent the world's largest garbage dump from being built at the defunct Kaiser iron ore mine at Eagle Mountain. The plan is to transport and deposit 20,000 tons of garbage from Los Angeles to Eagle Mountain on trains and trucks for the next 117 years. This project

has been mired in litigation. On September 20, 2005 Federal District Judge Robert Timlin ruled in favor of environmentalists, however the Government and the Polluters appealed the decision to the 9th Circuit Court of Appeals. The case was heard December 6, 2007 and we await the ruling, (for more information on the dump see www.ccae.org and click Desert Community.)

The Eagle Crest Energy Company ("ECEC") intends to utilize the Eagle Mountain mine site to produce electricity. This project received its preliminary permit in March 2005 from the Federal Energy Regulatory Commission ("FERC"), and has recently filed a license application. The plan is to pump ground water from designated water wells in the Chuckwalla Valley to the massive east pit at Kaiser's old mine to be stored until low peak energy times when the water will be pumped to Kaiser's Central Pit. When electricity demands are at peak times, the water in the central pit is released through monstrous tunnels (built under the dump) heading to the east pit, where very large underground turbines will spin, creating electricity. The initial filling of the east pit will require 8 billion gallons of water, and take two years or more of constant pumping to fill. This project will exacerbate the aquifer's overdaft condition to depletion. Where will water come from for all of these projects, i.e. world's largest dump, hydro-electric pumped storage project, and tens of thousand of acres of solar panels? It has been proposed that Kaiser Ventures will supply water for OptiSolar's project (now Solar One). The problem with this is, the Kaiser well proposed for use, is on trespass on Public lands, and was once used for the mine's millsite. However since Kaiser went bankrupt and gave up all mining permits for the dump, that well is no longer for a millsite, and Kaiser illegally pumps water to the townsite now. If this well is used for the dump and solar panel projects, it will start to deplete the water resources of Joshua Tree National Park, as well as the Chuckwalla Basin's aquifer.

Preliminary studies conducted in the past indicate that there will be significant environmental impacts to the local community as well as the Park. Citizens have voiced strong concerns with the project's potential impacts to the environment and the local residents who depend on the desert's natural resources. For more information see: <http://www.eaglemountainenergy.us/index.html>. This project proclaimed as "green energy", will actually use more energy than it creates and, has been on the books since 1991.

And now to make it a true environmental justice trifecta, Secretary of Interior Salazar has designated and put on the fast track, a very large area of public lands in the Chuckwalla Valley as solar sacrifice zones (see <http://solareis.anl.gov>). In the upper Chuckwalla Valley alone, 30,543 acres being targeted for solar fields. To fast track these projects leads the public to believe that there has been a predetermined decision made to approve and construct these projects, completely infects the public process, and violates the National Environmental Policy Act (NEPA). The State of California has developed the California Environmental Quality Act, and the Federal Government developed the Council on Environmental Quality with the Environmental Impact Study the vehicle which the public may articulate its concerns. The reason for these

environmental documents is to provide decision-makers with all of the available information to ensure a knowledgeable decision is rendered. There needs to be separate environmental review for each of the 24 sites that are being targeted. To do less only shows the DOI's and DOE's desire to by-pass any meaningful discussion for each project involved, and sweep any problems under the rug. Further, The National Environmental Policy Act of 1969 ("NEPA"), 42 U.S.C. § 4331(2)(c), requires all agencies of the federal government to prepare an environmental impact statement for all major projects significantly affecting the quality of the human environment. The solar projects proposed in the Chuckwalla Valley meet this criteria and separate environmental studies are required by law.

Let's get one thing straight right here. EVERYBODY wants independence from fossil fuels. The energy policies being adopted by the Obama Administration and elected officials are misguided. Taking ratepayers and tax payers off our knees to the foreign and American oil corporations only to put us on our knees to foreign and American "renewable energy" corporations does nothing to solve the "control" problem. Instead of giving away our precious public lands for a song and a dance, and then giving recovery funds to corporations, make legislation to assist homeowners, property owners, and businesses to obtain recovery money to install rooftop solar, thin film solar, micro-windmills to make us all truly energy independent. It would not cost more and will result in an economic engine boosting our economy with jobs. Not one acre of public lands should be bladed for solar projects until EVERY ROOFTOP IN CALIFORNIA HAS SOLAR PANELS.

Thousands of acres of solar panels are proposed to be built next to Joshua Tree National Park wilderness areas next to the mouth of the Pinto Basin and along the base of the Coxcombs. It is interesting to read news articles describing the locations of solar sacrifice zones.

One account they are "east of Joshua Tree National Park", when in fact some are dangerously close to its southeast boundary. We collaborated with our colleagues from the Basin and Range Watch and created a web page of images and text that memorializes the natural resources of the Chuckwalla Valley and Joshua Tree National Park. We incorporate the images and information of the website page, <http://www.basinandrangewatch.org/ChuckwallaValley1.html>, as though fully contained herein, and make it a part of the Public Record.

Do these people in power not know where these areas are, or do they consciously deceive a heretofore trusting public? Our legislators ought to be approving legislation such as AB 811, reinstate Feed In Tariffs, and work with their constituents to become energy independent. Not one acre of public lands should be bladed for solar projects until EVERY ROOFTOP IN CALIFORNIA HAS SOLAR PANELS.

Recognizing the importance the National Park system is to the American people, Interior Secretary Ken Salazar has announced that his department is temporarily barring the filing of new uranium mining claims on about 1 million acres near the Grand Canyon, an Obama administration official said. (AP 7/20/09)

In the late 1990's President Clinton halted a gold mine outside Yellowstone National Park saying that "...our National Parks are more valuable than gold...".

We ask, "Is Joshua Tree National Park less valuable than faux renewable energy projects and garbage"?

The Pinto Basin in Joshua Tree National Park is home to the healthiest tortoise populations in California. Currently there are no polluting facilities that impact their health. Conversely, the Chuckwalla Bench Area of Critical Environmental Concern has realized a 90% decline in tortoise populations and necropsies have shown toxics in their internal organs. CCV have documented tortoise activity, burrows, scat, and tortoise themselves roaming the Upper Chuckwalla Valley in the areas proposed for solar projects. There is a land bridge across the Upper Chuckwalla Valley that begins inside the Pinto Basin and travels across the Valley along the Coxcombs to the McCoy's. Removal of this land bridge will have significant negative impacts to the tortoise and other wildlife depending upon it for survival. Not one acre of public lands should be bladed for solar projects until EVERY ROOFTOP IN CALIFORNIA HAS SOLAR PANELS.

In a conversation with OptiSolar's Wayne Hoffman, CCV learned that they plan to utilize the defunct private railroad owned by Kaiser Resources (still under federal litigation) to transport equipment to construct their project, which has since been sold to Solar One. An

existing, deactivated 52-mile rail line leading from the Salton Sea to Eagle Mountain, along with a right-of-way along that rail line, and the associated upgrades of the rail line and right-of-way should also be considered part of the Solar One project. The rail line and right-of-way pass through an established area of critical habitat for the desert tortoise and desert pupfish, threatened species under the ESA. They also traverse the Chuckwalla Bench Area of Critical Environmental Concern (ACEC), which was designated as such because it contains a significant population of tortoise. Because Solar One includes this rail line in their project which would have adverse impacts on the desert tortoise and Desert Pupfish, BLM is required to enter into consultation with the U.S. Fish and Wildlife Service ("FWS") under Section 7 of the ESA.

What are the cumulative impacts from transporting solar equipment and the transportation of 20,000 tons of garbage daily with regards to traffic congestion, air quality impacts from more trains in an area that boasts of a Class I airshed, and how will additional train trips affect the continued existence of the desert tortoise and desert pupfish? Currently this private railroad is in complete disrepair and will cost up to \$200 million dollars to bring back to fit repair. Will our tax dollars be used to reconstruct a private railroad?

BIOLOGICAL RESOURCES: Complete analysis of the impacts to these biological resources need to be conducted singularly and cumulatively with past, present, and foreseeable future projects.

Special-status plant species observed in the project area:

- FOXTAIL CACTUS: A federal Category 2 candidate and a California Native Plant Society ("CNPS") 1B species.
*Category 2 = information is currently being collected to see if the species should be listed as threatened or endangered.
*1B species = Plants rare, or endangered in California and elsewhere•

•CALIFORNIA BARREL CACTUS: A BLM Sensitive species observed within the access roads, and along the rail line.

- OROCOPIA SAGE: A federal Category 2 candidate and a CNPS List 1B, observed along the rail line.

Special-status Wildlife species occurring in the vicinity of the projects:

- DESERT PUPFISH: A federal and state listed endangered species. Observed approximately 1/4 mile south of the Eagle Mountain railroad

trestle in a tributary of Salt Creek, and earlier surveys report the species is present throughout Salt Creek. Studies indicate that the best pupfish habitat in the area begins approximately 1 mile below the rail trestle and extends upstream to the headwaters of the tributary. Of particular interest is that this species could be wiped out with the planned construction/repair of the railroad. It is virtually impossible to relocate this species because each pool is minerally unique in composition - Personal conversation with National Park Service in Death Valley.

- COMMON CHUCKWALLA: A federal Category 2 species occurring at the project sites and moderate occurrence along the rail line

- FLAT-TAILED HORNED LIZARD: This species has been proposed for federal listing as threatened and is a California Species of Special Concern. The species occurs in the vicinity of the rail line near Ferrum Junction.

- * California Species of Special Concern = When encountered, should be reported to the Department , and for which impacts may be considered significant under CEQA.

- DESERT TORTOISE: This species is federal and state listed as threatened. Tortoise have been observed in the Chuckwalla Valley, north of I-10 in the Eagle Mountain area, the Chuckwalla Bench north of the Chocolate Mountains, and on the railroad. The Eagle Mountain railroad and parts of Eagle Mountain road cut through the Chuckwalla Unit of Critical Habitat for desert tortoise. The impacts to this species is not only from train and truck traffic. Ravens historically are attracted to dumps, and ravens prey on juvenile tortoise. It is expected that predation on the desert tortoise will increase. (Personal conversation with Park ecologist). A recent report by Dr. Richard Knight of the University of Colorado describes the Park's Pinto Basin as the

most pristine raven habitat in all of the Mojave desert. He regards Joshua Tree National Park as a unique habitat with unaltered raven densities. There are a number of mitigation measures to decrease the impacts to the desert tortoise, however the effectiveness of some of the mitigation strategies are unproven.

- NORTHERN HARRIER: A California Species of Special Concern. This species is considered to occur seasonally along the rail line, and may seasonally forage in habitat at the project site and along access roads

- SHARP-SHINNED HAWK: A California Species of Special Concern. Likely to migrate in the vicinity of the projects in the fall and

spring, and may winter in any part of the project areas. The species may also seasonally forage in habitat at the project sites and along the rail line.

- COOPER'S HAWK: A California Species of Special Concern. Most parts of the project areas are within the year-round ranges, although the central part of the rail line passes through an area of winter-range only.

- GOLDEN EAGLE: A California Species of Special Concern. The species is highly likely to occur in any portion of the project area. Note: Members of CCV have observed these beauties several times in this area.

- PEREGRINE FALCON: Is a federal and state listed endangered species with a low to moderate probability to occur at the project site, access roads, and rail line. Members of CCV have observed in the project areas.

- CALIFORNIA BLACK RAIL: A federal Candidate 2 candidate and is state listed as threatened. Have been observed in the Salt Creek area north of the rail line, and do occur within one mile of the project area.

- YUMA CLAPPER RAIL: A federally listed endangered species and state listed threatened species, observed in the Salt Creek area north of the rail line.

- WESTERN BURROWING OWL: A federal Category 2 candidate species and a California Species of Special Concern, with a moderate likelihood of occurrence at the project site, access roads, and rail line.

- BLACK-TAILED GNATCATCHER: Considered a California Special Animal by CDFG, and observed near Kaiser & Eagle Mountain Roads.

- * California Special Animal = an animal fully protected by the state.

- LECONTE'S THRASHER: A federal Category 2 candidate and California Species of Special Concern, observed near Kaiser & Eagle Mountain Roads and could nest in habitat at the project and along the rail line.

- LOGGERHEAD SHRIKE: A California Species of Special Concern that is expected to occur throughout the project areas.

• YELLOW WARBLER: A California Species of Special Concern observed in the townsite of Eagle Mountain and the Chuckwalla Bench Area of Critical Environmental Concern ("ACEC").

• YELLOW-BREASTED CHAT: A California Species of Special Concern observed in the townsite and expected to occupy habitats throughout the project areas.

• CALIFORNIA LEAF-NOSED BAT: A federal Category 2 candidate and a California Species of Special Concern who uses the Kaiser Mine as a winter roost. There have been no other winter roosts located during air searches over the Orocopia, Chuckwalla and Coxcomb Mountains.

• TOWNSEND'S BIG-EARED BAT: A federal Category 2 candidate and a California Species of Special Concern. Maternity roost of this species was observed in the mine adit during 1990 surveys, however subsequent surveys did not identify this species, possibly indicating that the roost has been abandoned. If the species is present, it is likely to forage in nearby areas, including near access roads & rail line and areas closer to the mine.

• CALIFORNIA MASTIFF BAT: A Category 2 candidate and a California Species of Special Concern. Suitable habitat is present, and the species is listed as one that could occur at the project site (Brown, 1990). The entire project area is within the range of the species.

• PALLID BAT: A California Species of Special Concern was captured in a mist net over a mine pit pond during the 1990 surveys, and guano was found in two adits west of the project site. The species is likely to forage in areas near access roads and rail line, and it is known to forage over pond water, which forms from standing water after a rainfall in the bottom of the east pit.

• AMERICAN BADGER: A California Species of Special Concern identified at the project site and near Kaiser Road. The species is highly likely to occur along the rail line. Members of CCV have observed this species a number of times in project areas.

• YUMA MOUNTAIN LION: A Category 2 candidate and California Species of Special Concern. Mountain lions have been observed at the Eagle Mountain townsite, and several farms in the Desert Center/Eagle Mountain area.

• NELSON'S BIGHORN SHEEP: A California Special Animal observed at the project site, and several locations along the Eagle Mountain railroad.

Biodiversity is the concept that all components of ecological systems, both living and nonliving, are interconnected in a hierarchical continuum, and that changes in the diversity at any level in that hierarchy can have effects at other levels (CEQ, 1993). The Council on Environmental Quality ("CEQ" 1993), has identified several primary threats to biodiversity, including:

- Physical alteration of ecosystems from resource exploitation and changing land use including habitat destruction, degradation and fragmentation;

- Pollution, which can have direct lethal or sub lethal effects, or can degrade habitat through such factors of eutrophication, acidification, or thermal pollution;

- Over harvesting of populations, which results in disruption of interconnections within and/or between species, thus affecting ecosystem function;

- Introduction of exotic species, which can eliminate native species through predation, competition, or disease transmission, thus altering interconnections between species and changing ecosystem function; and

- Disruption of natural processes, which can occur when land management procedures change ecosystem dynamics through such practices as fire suppression or changes in water flow regimes.

To conclude the section on Biological Resources, it is clear that the impacts to wildlife will range from moderate to extreme. The proposed dump, if goes to fruition, will bring in 20,000 tons of garbage a day for a century. This is garbage to us, but a source of food for animals. This process will inevitably create additional sources of nutrition for animals to exploit. In the desert where resources are scarce, even a small amount of enrichment is highly attractive to animals and is all that is required to alter wildlife behavior. (Personal conversation with Park ecologist). To compound the problems, there is a proposal to construct a hydroelectric pump-storage plant at the same site. This proposal will introduce a huge source of water that is currently scarce in the desert region. The entire ecosystem in and around the project site, and Joshua Tree National Park, will be thrown out of kilter, should either of these projects go forward, and the solar projects will compound the impacts by reducing the habitat for animals to live and forage for food.

Representatives from solar projects inappropriately declare that the tortoise will find shade and make homes under the solar panels. This is pure, unadulterated hogwash! The temperature of the ground will be magnified by the panels, not cooled ! The ground temperature could get as high 140°F, add mirrors to that and it will increase

exponentially. Nothing would be able to live under them, much less a tortoise. Not one acre of public lands should be bladed for solar projects until EVERY ROOFTOP IN CALIFORNIA HAS SOLAR PANELS.

Is scraping the desert bare really the answer to global warming, or just more corporate welfare, giving developers free land, free money and in Solar One's case, tax payer/ratepayer dollars to buy the solar panels they make and sell to themselves? We say "no". In fact researchers are finding that the desert is sucking up carbon at rates they never imagined.:

"...Researchers have found that Nevada's Mojave Desert, square meter for square meter, absorbs about the same amount of CO₂ as some temperate forests. The two sets of findings suggest that deserts are unsung players in the global carbon cycle. "Deserts are a larger sink for carbon dioxide than had previously been assumed," says Lynn Fenstermaker, a remote sensing ecologist at the Desert Research Institute (DRI) in Las Vegas, Nevada, and a coauthor of a paper on the Mojave findings published online last April in Global Change Biology.

The effect could be huge: About 35% of Earth's land surface, or 5.2 billion hectares, is desert and semiarid ecosystems. If the Mojave readings represent an average CO₂ uptake, then deserts and semiarid regions may be absorbing up to 5.2 billion tons of carbon a year--roughly half the amount emitted globally by burning fossil fuels, says John "Jay" Arnone, an ecologist in DRI's Reno lab and a co-author of the Mojave paper...". (Science 13 June 2008: Vol. 320. no. 5882, pp. 1409 - 1410 DOI: 10.1126/science.320.5882.1409).

There needs to be a complete analysis of how much carbon will not be absorbed due to denuding the desert for solar panel development, and how much carbon will be added to the environment from the necessary transmission lines?. To wit:

On April 17th, the Environmental Protection Agency released a list of the top 5 toxic gases being emitted that "endanger public health and welfare". One of these gases is sulfur hexafluoride, also known as SF₆. Here is what the EPA says about SF₆:

"With a global warming potential 23,900 times greater than CO₂ and an atmospheric life of 3,200 years, one pound of SF₆ has the same global warming impact of 11 tons of CO₂."

As it turns out, the most common use for SF6 worldwide is as an insulator in high voltage equipment that transmits electricity!

Also, an analysis of which alternative will meet the objective of curbing global warming; hundreds of thousand of denuded acres in the desert OR rooftop solar and micro windmills? Studies that have been conducted suggest that the Joshua Tree National Park's signature tree, the Joshua Tree may be nonexistent in the Park due to air pollution from flows from Los Angeles, Riverside, and Coachella Valley. How will the proposed solar projects not accelerate this phenomenon? Not one acre of public

lands should be bladed for solar projects until EVERY ROOFTOP IN CALIFORNIA HAS SOLAR PANELS.

For the past three years, National Park Service at Joshua Tree National Park has maintained and operated an air quality monitoring system within close proximity to Eagle Mountain. Data collection began in May 2006 with a collection interval of 180 days (October). The 180 day cycle continued 2007, 2008 and is now collecting data for a fourth 2009 session. The impetus for the data collection beginning in 2006 was to collect baseline ozone data in anticipation of operations for both the Eagle Mountain hydroelectric project and the dump. The data collection point is located on Park property, 6 miles northeast of the proposed dump and hydro projects, as well as proposed solar projects. In Summary the "Final Validated" data collected in 2006 and 2007 at 85ppb standard indicated respectively only two days of violation of the eight hour standard. The 2008 and 2009 (work in progress) are at the new NAAQS of 75 ppb and are presented here. If the older standard of 85 ppb were applied, one day in 2008 and zero days in 2009 would show a violation of the eight hour standard. All data indicate that during the summer months when ozone levels are at their highest, the eastern portion of the Park is substantially less impacted by high levels of ozone than the entire western portion of the Park. Maintaining this high level of air quality is paramount to NPS, environmentalists, desert residents, and the Clean Air Act. This information is from comments to the Federal Energy Regulatory Commission regarding the proposed hydroelectric project, dated August 17, 2009. We request what air quality impacts will be visited on the Park and the community of Desert Center/Eagle Mountain singularly and cumulatively including past, present, and reasonably foreseeable future projects.

Groundwater: To calculate groundwater usage several significant groundwater users must be included. The below list includes a non-

comprehensive list of water users and potential water users in the Chuckwalla Valley:

Farms in Chuckwalla Valley (Jojoba, grapes, row crops)
Chuckwalla State Prison
Ironwood State Prison
City of Blythe
Corn Springs palms/ponds/row crops/fish farm
 Fish Farms on Kaiser and Rice Road
Residents at Lake Tamarisk
Golf Course @ Lake Tamarisk
Winter visitors @ Lake Tamarisk
Eagle Crest Energy Company
Eagle Mountain dump
Chuckwalla Valley Raceway

The solar projects are not feasible because there simply is not enough water to sustain the project as well as historic water users in the Chuckwalla Valley.

Solar panels for large centralized photovoltaic installations are getting cheaper, but are at best 10% efficient in converting solar to electrical energy. Solar thermal installations are comparably inefficient, and require even more water than photovoltaic plants. All grid-connected solar developments require conversion of DC to AC for transmission on the existing grid, entailing a 16% loss of energy—plus another 7 - 9% loss in transmission. Solar panels degrade over time, beginning with an almost instant loss of 2-3% of output, followed by anywhere from 0.5 to 3% annual degradation of energy output. For a 20% efficient panel, a 3%/year loss of output reduces the output to 11.5% in 20 years.

The materials for these installations will need to be replaced over relatively short periods of time. It is certain that some, if not many, such installations will be abandoned. Guaranteed (bonded) reclamation of such sites must be a front-end cost for approving any installation. This should include putting up the money, prior to development, sufficient to pay for restoration of the land to an ecologically functioning state. The lessons from inadequate bonding of mining and wind energy enterprises must be employed, and all routes of escape, like corporate bankruptcy, from the obligation to restore the land should be closed.

There is a more-than-ample supply of platforms for solar installations that do not require any additional land consumption, and have minimal transmission requirements: roof-top developments in urban areas. These avenues should be explored before any centralized power plants in remote areas are considered.

Lastly, over 6,000 acres of jojoba were planted in Desert Center/Eagle Mountain in the early 1980's. The BLM gave away land at \$2.50 an acre under the Desert Land Entry Program, which has since been discontinued. Hundreds of acres of ironwood forests and dry wash woodlands were developed with jojoba, now abandoned. What will be the impacts be to the environment (i.e. soil erosion, flooding etc.) when the remaining ironwood forests and dry wash woodlands are scraped away for solar?

Jojoba, a renewable natural resource, was included in the 98th Congress Report 98-109, CRITICAL AGRICULTURAL MATERIALS LIST. The Report states, in part, "...Congress recognizes the need of a domestic industry or industries for the production and manufacture from native agricultural crops of products other than rubber which are of strategic and industrial importance but for which the Nation is now dependent upon foreign sources, that such activities would benefit the economy, the defense, and the general well - being of the Nation, and that additional research efforts in this area should be undertaken or continued and expanded...". Former Congressman Al McCandless (R Palm Springs) was responsible for adding jojoba to the critical agricultural materials list. Jojoba plantings need to be part of the Alternative Actions section of the environmental documents. Members of CCV are experts in the field and will be happy to provide further information. This plant is native to the area, and the infrastructure is already in place to re-start the industry, thus providing an

alternative energy source from the region you desire to develop alternative energy projects.

Not one acre of public lands should be bladed for solar projects until EVERY ROOFTOP IN CALIFORNIA HAS SOLAR PANELS.

Respectfully Submitted,

Donna Charpied

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Citizens for the Chuckwalla Valley

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"Don't Waste The Desert"

CC: Interested Parties