

Thank you for your comment, Terry Weiner.

The comment tracking number that has been assigned to your comment is SolarS50417.

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Solar Energy Development PEIS  
Comment ID: SolarS50417

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Attachment: Desert Solar PEIS DPC comments.doc

Comment Submitted:

[See Attachment.](#)

***Delivered via Solareis web site and the US Postal Service***

Solar Energy PEIS Scoping  
Argonne National Laboratory  
9700 S. Cass Ave. – EVS/900  
Argonne IL 60439  
July 14 2008

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

To Whom It May Concern:

Thank you for the opportunity to submit scoping comments on the Solar Energy Development Programmatic Environmental Impact Statement (PEIS). This comments are submitted on behalf of the Desert Protective Council as an elaboration on comments made in person by Terry Weiner at the July 10 2008 El Centro Solar Peis Scoping meeting.

We would like to thank you again for providing that additional El Centro public scoping meeting and for the extension of the comment period until July 15 2008.

The Desert Protective Council is a 50-year-old non-profit 501c(3) membership organization with members throughout the desert southwest and nationwide. The DPC's mission is to safeguard for wise and reverent use by this and succeeding generations those desert areas of unique scenic, scientific, historical, spiritual or recreational value, and to educate children and adults to a better understanding of the deserts. We pursue our mission through a carefully designed and equally balanced program of advocacy, education, and stewardship.

The desert is a complex living breathing connected community of soil, plants and animals and though we may not yet understand all of the connections, the health of the desert is important to humans as well.

The Desert Protective Council understands the urgency of coming up with solutions to address climate change but in the process, we do not want to imperil the very resources we are trying to protect by a headlong rush into desert we have fought so long to protect.

We appreciate also that the southwestern deserts are full of solar potential, but so are our rooftops, industrial sites, and parking lots with in our cities nationwide.

The renewable energy landscape has changed dramatically in the last 12-24 months as a result of thin-film photovoltaic (PV) developments and the very rapid expansion of PV production capacity worldwide. PV on commercial rooftops or parking lots takes up zero land because it allows the existing use of the developed land to continue unimpeded. And

the reality is that the cost of commercial rooftop solar is now effectively the same or less than the remote solar technologies. These PV developments have happened fast, primarily because of the very recent widespread availability of thin-film PV and recent dramatic drops in PV cost have completely changed the ballgame.

The BLM has many management plans in place to protect irreplaceable resources such as cultural areas and sites and endangered and threatened species. The Desert Protective Council urges the Department of Energy and the BLM to keep these management plans in place. The crafting of these plans took the BLM many years of analysis and public process in their creation. We don't want to jettison these protections for the sake of industrial solar energy development, which can be more cheaply accomplished and with fewer impacts to the public lands of the desert southwest, close to the urban "load centers".

- The PEIS must consider how the solar projects will or will not be compatible with all of the BLM management plans
- The PEIS must consider how the solar projects will or will not be compatible with the BLM's mandate to prevent listings of species
- BLM should retain the current 1% cap on disturbance in DWMAS and the prohibitions against development in ACECs etc.
- The PEIS must address desert-wide cumulative impacts to air quality. Many desert air basins are in severe non-attainment for PM 10 and moderate to severe non-attainment for ozone.
- The PEIS must consider impacts to fragile desert soils, to the thousands of years old desert pavement and to the desert microbial crusts. Desert soils are the foundation of all life in the desert. Removing crust and desert pavement and disturbance of desert soils from vehicular use contributes to particulate air pollution, which can sometimes be seen in satellite photography taken over the desert.
- The PEIS must thoroughly analyze the risks when transporting energy to the coast across the San Andreas Fault Zone (SAFZ) and the Extreme Fire Threat areas in Southern California. Please incorporate by reference the scoping comments on these issues in the comments submitted by the Mojave Desert Land Trust.
- The PEIS must thoroughly consider the socioeconomic, security, and environmental effects of remote installations versus locally distributed power and analyze 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 to bear the brunt of providing energy for the urban areas across the country is not acceptable.
- The PEIS should consider an alternative that focuses renewable energy development adjacent to existing high voltage transmission corridors
- The PEIS should consider the cost of transmission that is required by remote installations versus the cost savings of locally distributed power.

- The PEIS must thoroughly analyze potential economic, material, and nonmaterial impacts to desert communities if the greater desert areas are industrialized with solar energy and transmission projects. Many desert communities depend economically on tourism, recreation, and other cultural activities such as art, historical, and spiritual tours and retreats. Loss of greater-desert view shed and open space means loss of livelihood for desert communities.
- The PEIS should include a thorough survey of impacts to cultural and historically significant lands and sites throughout the desert area, including areas developed as part of the historic 1938 Small-Tract Homestead Act that shaped many of the outlying, low-density communities in the Morongo Basin and elsewhere in the Southwest deserts.
- In this regard, 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.
- 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.
- The PEIS should study the impacts of worker population on sensitive desert resources during both construction and operational phases of solar and transmission development.
- 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 and consequent proliferation of new routes.
- 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.
- 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.
- In addition to National Parks and Monuments and other protected areas, the PEIS must remove from consideration all Desert Wildlife Management Areas because adherence to the 1% disturbance cap would be virtually impossible.
- The PEIS should remove from consideration of all Areas of Critical Environmental Concern and areas that are under consideration as potential wilderness and under consideration as wildlife corridors.
- The PEIS must include a programmatic evaluation of cumulative impacts to Endangered and Listed species, including the Desert Tortoise and the Peninsular Bighorn Sheep.
- The PEIS must study the potential of construction and operational phases to introduce or encourage invasive non-native vegetation, including *Brassica tournefortii* or Saharan Mustard, not just at project locations but throughout the desert areas as a result of construction and development

In summary, remote concentrated solar is the biggest threat perhaps ever to have come along for the desert because it destroys all the resource values. This PEIS process needs to consider all alternatives to concentrated solar development and focus any desert development very carefully, and put the rest of our precious desert off limits for now in order to see where technology takes

renewables in the future. The benefit is that we can avoid giving up sensitive natural areas and irreplaceable desert resources before we discover whether or not it is necessary.

Thank you again for this opportunity to submit comments. Please keep the Desert Protective Council on the mailing list for all future meetings and announcements regarding the Solar Energy Development Programmatic EIS.

Sincerely,

Terry Weiner

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