

Thank you for your comment, Brad Mitzelfelt.

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Solar Energy Development PEIS
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Attachment: Solar PEIS Final Comments 07.15.08.pdf

Comment Submitted:

July 15, 2008

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

Thank you for the opportunity to comment on the Solar Energy Development Programmatic Environmental Impact Statement.

The rush to develop alternative energy in the form of wind, solar and geothermal, along with the expansion of the transmission systems, has become one of the gravest challenges facing the desert.

I am an elected official who represents San Bernardino County's First District, the largest supervisorial district in the contiguous United States at approximately 17,000 square miles. My district encompasses much of the Mojave Desert and there are scores of applications for wind and solar energy projects in my district alone.

I am also Vice Chairman of the QuadState Local Governments Authority, a joint powers authority made up of seven counties in four Western states with large areas of public land. In addition, I am a member of the National Association of Counties' Public Lands Steering Committee. However, I am writing today on behalf of the County of San Bernardino.

We support conducting a Programmatic EIS on solar energy development because it is the best vehicle for gauging the cumulative impacts of these projects, which have the potential to cover hundreds and hundreds of square miles of sensitive and important land.

First, I want to say I was extremely disappointed by the BLM's decision to lift the moratorium on new solar applications. The desert is shrinking rapidly under intense pressure from the need to protect wildlife and plant species, most notably the threatened desert tortoise, expansion of military installations, including the National Training Center at Fort Irwin and the Marine Corps Air Ground Combat Center in Twentynine Palms, increasing urban development, (the population in my district has increased more than 40 percent since 2000), increasing demand for recreation on public lands, and other historic uses including mining and ranching. I felt that with as many projects under review as currently exist, already straining staff resources, the moratorium was an appropriate interim policy.

There are numerous issues that should be addressed in the Solar PEIS.

California Desert Conservation Area

We request that special attention be paid to the California Desert Conservation Area and that the PEIS have a level of detail regarding the CDCA to empower managers and residents to have maximum confidence that these projects will not harm the environment and will be ultimately beneficial. We support amending the plan if that is the best mechanism for protecting the desert. Ideally, we would like to see areas defined that are appropriate for solar development and areas that will remain closed to solar development. Local BLM officials have been doing their best to keep projects out of defined sensitive areas.

Water

One area of profound concern is the use of water. As the entire Southwest has been in a severe drought this decade and deliveries of imported water become increasingly unreliable, the PEIS must examine in detail the impacts on water, including groundwater aquifers.

Under San Bernardino County Ordinance 3872, adopted in October 2002, groundwater withdrawals in unadjudicated basins that will harm the Groundwater Safe Yield are not permitted. Groundwater Safe Yield is defined in Section 33.06553 (i) as: "The maximum quantity of water that can be annually withdrawn from a groundwater aquifer (i) without resulting in overdraft (ii) without adversely affecting aquifer health and (iii) without adversely affecting the health of associated lakes, streams, springs and seeps or their biological resources."

The County of San Bernardino and the U.S. Bureau of Land Management entered a Memorandum of Understanding in 2003 for implementation of Ordinance 3872 on public lands in the Mojave Desert. The ordinance and the MOU are attached.

The PEIS must consider the cumulative impacts on water supply throughout the desert in light of ongoing urban growth, reduced supplies, and the need to maintain the health of desert ecosystems. The water issue must be examined in total and look at all supplies and demands projected for the study areas. It must examine the role of Ordinance 3872 in granting approvals.

Each solar technology uses a different amount of water and the PEIS should discuss each type of solar generation in regard to its water use and analyze the impacts of each type on water supplies.

West Mojave Plan, other plans

The PEIS must conform to, and be integrated with, the West Mojave Plan, a 9.3 million-acre Habitat Conservation Plan that will be a key tool in the recovery of the desert tortoise and numerous other species. In addition to the West Mojave Plan, the PEIS must examine other HCPs in areas considered for solar energy development along with the General Plans of local governments that may be affected.

Birds

While the impact of wind energy on birds is well documented, thermal solar projects that use power tower technology also pose a major threat to birds. The intense heat near the towers can kill birds instantly. The impacts on birds must be examined and requirements for avian studies and surveys, similar to what is now required for wind projects, should be imposed.

Wind and Geothermal Energy

In light of the burden placed on public lands by the Energy Act of 2005 with a requirement for 10,000 megawatts of generation by 2015, the PEIS should examine the cumulative impact on public lands of other alternative energy sources that are being developed, especially wind and geothermal. The wind projects also take up huge areas of land, create visual blight, affect wildlife corridors and habitat, and have the potential to reduce property values, restrict recreation and reduce tourism. The solar projects are not happening in a vacuum and to accurately gauge cumulative impacts, the PEIS must examine all pressures on the desert.

Aesthetic Impacts

Solar projects require huge areas of land, which must basically be cleared of vegetation and species. The loss of visual resources, i.e., spectacular scenic vistas, is a major concern. The desert draws millions of tourists each year, and in addition to Americans, the region is especially popular with European and Japanese tourists, bringing a major boost to local economies.

The power towers in concentrating thermal plants can be as high as 459 feet. The tallest structure in neighboring Riverside County, the Morongo Casino Resort and Spa, is visible for miles in all directions. It is by comparison only 300 feet tall.

With numerous wind projects and the potential to string scores of 410-foot-tall turbines across ridge tops, along with 450-foot solar power towers, would threaten vistas across the desert. The PEIS must not focus only on solar when it comes to visual and aesthetic impacts. Wind and solar projects will by far be the tallest structures in the desert. They must be considered together in order to have a true analysis of cumulative visual impacts. One of the innate values of the desert for recreationists and visitors are its broad vistas uninterrupted by development and habitation. Development of renewables will largely destroy these values in the Mojave Desert.

Mitigation

A major question is how these projects can mitigate their impacts when sited in sensitive areas. Almost every acre of land in the desert has the potential to be spoken for in the next few years, if they are not already committed.

How can a project mitigate for habitat loss when there is no habitat available?

The PEIS must discuss what standards will be used for mitigation and how those standards can be met when the desert is under such pressure.

Multi-use

BLM lands are reserved for multiple use. Off-highway vehicle enthusiasts, rock hounds, hikers, campers, ranchers, and miners rely on these areas that belong to the American people.

These opportunities will be lost forever where the projects are built, and other areas will be squeezed even more for those historic and important uses.

The PEIS must analyze the trade-offs in light of BLM's multi-use mandate. For example, if an OHV opportunity is lost, can it be made up somewhere else? Is that even possible?

Analysis methodology

We strongly encourage the government to use the Mitigation Hierarchy, developed by the Council on Environmental Quality, a rigorous methodology for an analysis of this scale.

Broad energy analysis

We must see a discussion of capacity of each energy source.

It would be appropriate to include a broad look at the current energy supplies and future needs, and their potential sources. There must be an analysis of the likely energy mix. How many megawatts can we reasonably generate from each source? The DOI working with Department of Energy should set goals that will maximize output based on appropriate siting for each type of generation, while minimizing the impacts.

How many megawatts can we reasonably save by conservation, or with local distributed power? In Southern California's High Desert, the region needs more than 100 square miles of warehouse space to deal with growing international trade. Rooftop photovoltaic can provide a major source of power and may be able to mitigate some of the generation required on public lands.

Aviation

Impacts to aviation must be analyzed due to potential glare from countless square miles of photovoltaics and the height of the solar power towers. In addition to commercial traffic, the Mojave Desert is home to four huge military bases with heavy aircraft traffic.

A major international airport is planned near Primm, Nevada, and not far from the proposed Ivanpah Solar Electric Generating Station, which will include at least six power towers nearby.

Transmission

The electricity must get from the generation source to consumers. The PEIS must consider the impacts of transmission. There are transmission corridors proposed outside of the areas being studied in the West Wide Energy Corridor PEIS. The Solar PEIS should integrate with the West Wide Energy Corridor PEIS and should look at other proposed corridors and their impacts, including, but not limited to Los Angeles County Department of Water and Power's Green Path North, and Sunrise Power Link proposed by San Diego Gas & Electric. Many of these projects are proposed for pristine desert areas, leading to further habitat loss and reduced opportunities for multiple-use.

Economic benefits

The desert has a quantifiable economic benefit from tourism, property values, mining, and other uses. Those values derive from the openness and availability of the land that belongs to the people of the United States of America. Turning the Mojave Desert into a powerplant would tarnish this natural, historic and economic asset.

Sincerely,

Brad Mitzelfelt
Supervisor, First District
San Bernardino County

[See Attachment.](#)

**Board of Supervisors
County of San Bernardino**

BRAD MITZELFELT
SUPERVISOR, FIRST DISTRICT



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