Thank you for your comment, Austin Puglisi.

The comment tracking number that has been assigned to your comment is SolarM60006.

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Solar Energy Development PEIS
Comment ID: SolarM60006

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This is the first of four comments I wish to make on the PEIS process.

This comment covers land use, water resources, ecological resources, and environmental justice.

Large tracts of the Mojave Desert have arleady been developed. Many plant and animal species are threatened or endangered as a result of range encroachment and habitat fragmentation. Industrial-scale solar projects will further stress these species, likely past the "tipping point" beyond which they cannot recover. Not nearly enough research has been done on desert ecosystems to know what effects development (on virtually all the Mojave flatlands) would have. In the great rush to give our public lands to energy companies for development, there has been much talk about speeding up the environmental review. We need more study, not less.

(1) More research should be done on the effects of deforestation. Desert vegetation and desert soil have been shown to absorb significant amouts of greenhouse gases. These studies are very recent and need to be expanded and duplicated so we know what we are losing before we lose it.

(2) Some policy-makers seem to have forgotten that the desert is a desert. Water is scarce. Already there is not enough to support current residential, agricultural, and industrial needs. Solar projects requiring water should be rejected if they can not demonstrate whrere that water will come from. If they are buying up water rights from others then they are creating a potentially devastating effect on local communities. Some rural citizens will lose their homes, or their farms, by Federal decree, so that urban citizens wil have more energy.

(3) The flow of underground water and the extent of aquifers in the desert has not been fully documented or studied. Projects depending on new wells may end up dropping the water level so that other wells far from the project go dry. Fauna and flora may be disturbed many miles from the project. This needs to be considered. Projects on untouched desert lands must not be considered benign until proven harmful; they must be assumed harmful until proven benign.

(4) The cumulative effect of dozens of industrial-scale projects needs to be considered. One such development may have only a small effect on the desert ecosystem. But if evelauated only as individual projects, too many will certainly be approved.

(5) Projects must not be considered withthe assumption that adequate transmission infrastructure is already in place. For example the maps provided for the California study area show a transmission corridor along the route of the LADWP's proposed "Green Path North" but this corridor does not curently exist. In many cases the need for construction of new high-voltage transmission lines would be more expensive, and more environmantally destructive, than the solar farms themselves. Proponents of these projects should not get a "pass" simply because another entity will be building the transmission lines.

In summary, we shouldn't "sacrifice" large tracts of desert when we don't know the effects of doing so. Many of the concerns outlined above would be minimized if the BLM were to prioritize local power genration (near point-of-use) with a distributed grid, and to limit new development to previously disturbed lands adjacent to existing power transmission lines. These areas exist. There will be political opposition to such a policy because some of that land is more expensive than the BLM's below-market-value fees, but policy changes on this scale need to be done based on what is right, not what is politcally expedient.