

Thank you for your comment, Pat Flanagan.

The comment tracking number that has been assigned to your comment is SolarS50521.

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Solar Energy Development PEIS
Comment ID: SolarS50521

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Attachment: BLM Solar PEIS.doc

Comment Submitted:

[See Attachment.](#)

July 13, 2008

Delivered via Solareis web site

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

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

To Whom It May Concern:

The mission of the Mojave Desert Land Trust is to preserve the Mojave Desert ecosystem and its cultural and scenic resources through land acquisition, stewardship, and education. The Land Trust comments and advises on projects that threaten or compromise desert resources and the community values and economy they help to sustain.

We appreciate that the BLM is providing opportunities for public involvement through the expanded scoping meeting agenda, website, and time extension. This letter elaborates on our comments made at the June 16 PEIS scoping meeting in Riverside.

Applications for potential solar development in the California desert region are planned to provide renewable energy to coastal cities. The Land Trust supports the development of renewable energy in California to meet the emission reduction goals in AB 32 but considers that the risks and unintended consequences of remote production and long range transmission of power could compromise any sustainable solution to our renewable energy needs.

The PEIS should 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. It is widely believed that “Because there is nothing out there...the desert is a good place for all sorts of infrastructure.” Not only must the desert’s wildlife, plant communities, cultural and community values, great visual marvels, and protected areas be analyzed, its most destructive elements must also be fully evaluated to successfully achieve green energy in the 21st Century. The desert is the dynamic infrastructure of the proposed technologies and it is neither inert nor lifeless; nor is it predictable.

- 1) The SAFZ separates the California Desert from the coastal population centers. On May 22, 2008 an interdisciplinary report, **ShakeOut Scenario**, representing the combined scientific wisdom of more than 300 scientists, engineers, and other experts from several agencies, was released in order to prepare for the largest earthquake drill in California history. The scenario supposes a 7.8 magnitude earthquake, similar to the recent earthquake in China. Among the predictions, **The fault would offset all lifelines crossing into Southern**

California at Cajon Pass, (Interstate 15), San Gorgonio Pass (Interstate 10) and along Route 14, including pipelines, power lines, roads, railways, telecommunications and aqueducts. According to the Southern California Earthquake Center this area has a 46% probability of a 7.5 magnitude quake in the next 30 years, and a greater than 99% probability of a 6.7 magnitude quake. <http://www.scec.org/core/public/scecontext.php/3935/13661> There are potential unintended consequences of transmitting energy across the seismically slippery edge of our continent. Given the probabilities, the PEIS should evaluate the long term effects of power loss on metropolitan areas, the length of recovery times and overall cost. These effects, of course, will be cumulative with the loss of the water, gas and other necessities.

- 2) The extreme fire hazard zones in Southern California, characterized by highly flammable vegetation, follow the same path as the SAFZ. http://frap.cdf.ca.gov/webdata/maps/statewide/ftthreat_map.pdf. Fires follow lightning strikes and rage with the Santa Ana winds. Fire not only destroys power lines, but the power lines themselves can cause fires, for example the 200,000 acre Witch Creek and Guejito fires in the San Diego back country. Because of climate change and vegetation type conversion the fire season is now year round and there is no guarantee that an area will not frequently reburn. In addition, the wildland-urban interface, characterized by housing in remote areas, is mixed within these zones, hampering fire fighting efforts and threatening the lives of fire fighters and home owners.
- 3) The PEIS should analyze the potential economic, material, and nonmaterial impacts to desert communities against the projected lifetime of the Big Solar projects, which are already considered “old” technology. In other words, the energy companies are not investing their land but the people’s land and, based on the projected lifetime of the Big Solar technology and its cumulative impacts on communities and natural resources, is this a prudent and fair investment for the people to have made on their behalf?
- 4) The PEIS should weigh the benefits of other technologies especially locally distributed power against the risks mentioned above.
- 5) The PEIS analysis team should consult with USGS scientists working in The Recovery and Vulnerability of Desert Ecosystems (RVDE) Program.

The engineering of solar projects is changing rapidly but it will always remain far less complex than the desert ecosystem on which the technology is sited. USGS Scientists have a long engagement in an “interdisciplinary approach to understanding the physical and biological processes that influence the vulnerability of the desert ecosystem to disturbance and its ability to recover.” <http://mojave.usgs.gov/rvde/> The Recovery and Vulnerability of Desert Ecosystems (RVDE) Program was initiated to conduct basic scientific research on ecological processes within the Mojave Desert ecosystem and to use this knowledge to provide

land managers with scientific understanding and tools needed to conserve and restore threatened desert landscapes.”

The California Area Earthquake Probabilities map and the California Fire threat map referenced above with their web sites are intended to be seen as part of this response. Please print them out. The Land Trust appreciates this opportunity to provide comments and looks forward to the continuing updates provided by the Solareis website.

Sincerely,

Claudia Sall
President