Thank you for your comment, Melissa Nicholson.

The comment tracking number that has been assigned to your comment is SolarS50568.

Comment Date: July 15, 2008 15:32:16PM
Solar Energy Development PEIS
Comment ID: SolarS50568

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See Attachment.

I am writing on behalf of the Desert Tortoise Preserve Committee, Inc. (Committee) to make public comment and participate in the scoping process for the development of a programmatic environmental impact statement (PEIS) for solar energy development. The Committee is a non-profit organization formed in 1974 to promote the welfare of the desert tortoise (*Gopherus agassizii*) in its native wild state. Committee members share a deep concern for the continued preservation of the desert tortoise and its habitat in the southwestern deserts. Committee activities include: establishing desert tortoise preserves by the processes of land acquisition and mitigation, developing and implementing management programs for desert tortoise preserves and adjacent areas, and education and research.

The Committee urges the Bureau of Land Management to develop strong environmental guidelines for utility-scale solar energy development in Arizona, California, Colorado, New Mexico, Nevada and Utah that will ensure that our wildlife and wild lands are protected for future generations. The Committee would like to draw the BLM's attention to a variety of factors that are essential for evaluating the placement of large-scale solar projects.

- **The Mojave Desert habitat**

Desert habitats are fragile, water-stressed ecosystems that have already been substantially degraded through a variety of human activities. Renewable energy placement within deserts must be ecologically appropriate. Green energy and environmental conservation can and should work together. Environmental considerations must be fully integrated into the Bureau of Land Management (BLM) decision-making process from the onset by attaching stringent screening criteria to the placement of sites and transmission lines.

- **The Mojave Desert is a rich wildlife resource**

Renewable energy should seek to altogether avoid placement on lands that have rich wildlife resources such as: National Parks, Desert Wildlife Management Areas, Wilderness Areas, Wilderness Study Areas, Areas of Critical Environmental Concern (ACECs), and areas that provide habitat for sensitive, threatened, or endangered species. The Endangered Species Act of 1973 and the California Endangered Species Act were enacted to safeguard our biological resources. These laws should be respected and serve as guidelines for the environmentally sound implementation of solar energy projects.

- **Water supply**

Water supplies are limited in the Mojave Desert and California is suffering the effects of a statewide drought. In light of these facts, the California Energy Commission (CEC) has stated that solar projects should not be wet cooled unless they make a showing of having wastewater of a certain minimum dissolved solids for that purpose. This policy should be echoed by the BLM when approving solar projects. Projects where overall water use is not compatible with available water supply or water use interferes with existing biological resources should not be approved.

- **Creation of new roads**

Large-scale solar projects involve the creation of new access roads through areas of previously undisturbed habitat. New roads create the risk of road mortality for many threatened and sensitive species (i.e. the desert tortoise and Mohave ground squirrel). The BLM should implement a desert tortoise proof fencing requirement along roads created by all projects approved within the range of the state and federally listed desert tortoise. New roads also increase the likelihood of invasive plant species proliferation throughout the Mojave. Invasive weeds not only compete with native species for limited resources, they also have less nutritional content for foraging animals than the native flora. Invasive plants increase the risk of dangerous wildfires starting and spreading in the desert. Additionally, roads fragment habitat and could disrupt existing animal populations. Roads also create access that would be used by others, such as off-road vehicle recreationists, and leads to habitat degradation.

- **Human subsidized predators**

New roads, vehicular traffic, and human activity associated with the construction, maintenance, and daily operations of large-scale solar projects will attract human subsidized predators such as ravens and coyotes. Both of the aforementioned species are known to prey on the desert tortoise. Ravens feed on young desert tortoises and one pair of ravens can eliminate all immature desert tortoises for several square miles. Coyotes can successfully eat large, fully mature tortoises. The ongoing drought has put increasing pressure on coyotes' natural prey items (i.e. rodents and rabbits). As a result coyotes have turned to desert tortoises as a supplemental food source. The BLM should consider the risk associated with an influx of human subsidized predators when approving projects, especially those that plan on building in critical habitat. The BLM should not allow projects in critical habitat. By definition it is habitat critical to the survival and recovery of the species.

- **Habitat degradation**

It has been 2 years since the BLM approved and signed the Record of Decision for the final version of its West Mojave Management Plan. Since that time the agency has failed to fully implement the management actions and protective measures for the desert tortoise and other species of concern. Large energy developments will add yet more strain to this already impoverished ecosystem making remaining habitats even more vital to the continued existence of desert tortoise and other rare species. Energy developments must be required to fully fund, in advance, the necessary mitigations and protections for desert tortoises and other sensitive species.

- **Abundance and distribution of selected elements**

A baseline survey was conducted to identify potential source toxicants in natural and anthropogenically-altered habitats of the desert tortoise. Several soil and plant anomalies were discovered that were clearly anthropogenic and the effects of the anomalies were found to have spread as far as 15 km outward from the disturbance source. Surface contaminants are spread and redistributed by wind, vehicles, and rainfall. The study found a link between vehicle exhaust and soil surface lead contamination. High levels of potentially lethal arsenic were found in plant samples

that desert tortoises are known to consume. Further study is needed to determine the distribution and abundance of elements in plants on which the desert tortoise forages and the roles of dust and systemic uptake. It is important that the BLM considers the increase of toxicants in the environment, the increased spread of toxicants throughout the environment, and the direction toxicants will be dispersed when considering specific projects for approval.

- **Land Mitigation**

Population growth, military expansion, and large-scale energy projects continue to spread throughout the Mojave Desert. As this process continues there are fewer tracts of suitable, contiguous habitat available for the appropriate mitigation for the desert tortoise and the Mohave ground squirrel. The BLM needs to be cognizant of these issues, most especially when being asked to consider opening protected lands by project proponents. The DTPC will be very interested in how the BLM will propose to mitigate the effects of large scale energy developments.

- **Translocation**

The BLM should carefully observe the on-going, large-scale translocation project that resulted from the recent Ft. Irwin expansion. On July 2, 2008 the Center for Biological Diversity and Desert Survivors filed suit in federal court over the relocation of hundreds of desert tortoises. The host of problems associated with the Ft. Irwin translocation project serves as a preview for the future of the Mojave if large-scale solar prospectors are allowed access to critical habitats. The Desert Tortoise Preserve Committee's stance is that large-scale translocation should be avoided and only used as a last resort.

More specifically the Committee urges the BLM to incorporate landscape-level and cumulative analysis into its application review process. Proposed development sites do not exist in isolation. In an effort to monitor overall health of our sensitive desert ecosystems, the BLM should consider existing and foreseeable projects and environmental problems when reviewing all applications.

The Committee would like to thank the BLM for this opportunity to comment and participate in the scoping process for the development of a programmatic environmental impact statement for solar energy development. Please send additional information by e-mail to dtpc@pacbell.