

Palen Solar PV Project

Comment Summary Report

Prepared for:
**Bureau of Land Management
Palm Springs–South Coast Field Office**



Prepared by:



October 2016

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1. Introduction

This Comment Summary Report documents the public outreach conducted by the U.S. Bureau of Land Management (BLM) for the Palen Solar Photovoltaic (PV) Project. EDF Renewable Energy (EDF RE), the project applicant, has filed an application to amend the pending Right-of-Way (ROW) application CACA-48810 to construct the Palen Solar PV Project, a 500 MW alternating current (AC) PV panel facility, on BLM-administered land in eastern Riverside County. As part of the project review process, the BLM, in conjunction with Riverside County, will prepare a Supplemental Environmental Impact Statement/ Environmental Impact Report (Supplemental EIS/EIR) that will evaluate the potential environmental impacts of the project in compliance with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) and supplement the Palen Solar Power Project (PSP) Plan Amendment/Final Environmental Impact Statement (PSP PA/FEIS) and PSP Revised Staff Assessment, which was a previously proposed solar project at the project site.

Since this is a Supplemental EIS/EIR, no new Notice of Intent (NOI) or Notice of Preparation (NOP) was published. The original NOI was published in the Federal Register for the PSP on November 23, 2009. A 30-day public comment period for this solar trough technology project began after the publication of the NOI and ended on December 23, 2009. A public meeting was held on December 11, 2009, for this project. The Energy Commission published a Notice of Receipt of an Application for Certification for the Palen Solar Power Project on October 1, 2009, that began the public review process for their CEQA-equivalent process after which they provided multiple opportunities for public comment both at public meetings and in writing. The Energy Commission held a Public Informational Hearing/Scoping Meeting January 25, 2010. The ownership of the project was transferred in 2012 and the new planned project was the Palen Solar Electricity Generating System (PSEGS), which proposed using solar tower technology. The PSEGS also did not have a new NOI or NOP published and no formal scoping activities occurred for the PSEGS Draft SEIS.

In order to provide the public with an opportunity to comment on the revised PV project application, the BLM held a public comment period for the Palen Solar PV Project from June 29, 2016, to September 3, 2016. This provided the public and regulatory agencies an opportunity to comment on the scope of the Supplemental EIS/EIR and to identify issues that should be addressed in the environmental document. A public notice was sent out on June 15, 2016, and July 18, 2016, notifying interested parties of the planned public meetings concerning the project. This report documents the issues and concerns expressed during the public meetings held on June 29, 2016, and August 4, 2016, and in the written comments received from the public, community organizations, and governmental agencies during this period.

1.1 Purpose of Comment Period

Although the Palen Solar PV Project did not hold a formal scoping process, the intent of the comment period was similar to that of scoping, to help determine the focus and content of the Supplemental EIS/EIR. The goal was to help identify the range of actions, alternatives, environmental effects, and mitigation measures to be analyzed in depth. As a reminder, the scoping process is not intended to resolve differences of opinion regarding the proposed project or to evaluate its merits. Instead, the process allows all interested parties to express their concerns regarding the proposed project and thereby ensures that all opinions and comments are considered in the environmental analysis. Scoping is an effective way to bring together and address the concerns of the public, affected agencies, and other interested parties. Members of the public, relevant federal, State, regional and local agencies, interest groups, community organizations, and other interested parties may participate in the process by providing comments or recommendations regarding issues to be investigated in the Supplemental EIS/EIR.

Comments received during the comment period are a part of the public record, as documented in this report. The comments and questions received during the public comment period have been reviewed and considered by the BLM in determining the appropriate scope of issues to be addressed in the Supplemental EIS/EIR and in the selection of alternatives to be carried forward for further analysis.

The purpose of the public meetings for the project was to:

- Inform the public and relevant public agencies about the revised project, NEPA and CEQA requirements, and the environmental impact analysis process;
- Solicit input on the Palen Solar PV Project for evaluation in the Supplemental EIS/EIR; and
- Update the mailing list of public agencies and individuals interested in future project meetings and notices.

1.2 Summary of the Project

The proposed Palen Solar PV Project is located in eastern Riverside County on land administered by the BLM. The 4,200-acre site lies north of the I-10 freeway, approximately 10 miles east of the Community of Desert Center to the northeast of the Corn Springs Road freeway exit.

The project as proposed by EDF RE includes the following major components:

- **Amendment** to the pending Right-of-Way (ROW) application CACA-48810
- **Construction** of a 500 MW AC solar PV panel facility, which includes:
 - Main generation area consisting of a solar field with two smaller adjacent solar fields for a total of three solar fields,
 - 200 power blocks with an electrical generating capacity of 2.5 MW each for a combined capacity of 500 MW,
 - On-site substation,
 - Site security,
 - Temporary construction laydown area of approximately 28 acres,
 - Internal and perimeter access roads,
 - Operations, administrative, and maintenance facility potentially on-site,
 - Up to ten on-site groundwater wells,
 - Potential off-site water source,
 - Redundant telecommunications cable installed beneath Interstate-10 along the gen-tie route, and
 - Single circuit, 4.5 mile, 230 kV interconnection (gen-tie) electric transmission line extending from the project electricity switchyard to the Southern California Edison Red Bluff Substation.

2. Public Outreach and Meetings

This section describes the methods used to notify the public and agencies about the informal scoping process conducted for the Palen Solar PV Project. It outlines how information was made available for public and agency review and identifies the different avenues available for providing comments on the project (i.e., meetings, email, mail, and phone).

2.1 Outreach

The BLM provided opportunities for the public and agencies to ask questions or comment on the project outside of meetings. The project manager's contact information and a project web-site were established and made available during the public comment period. Information on these additional outreach efforts are described below.

Project Information

The BLM Project manager is Jennifer Whyte. She can be connected via email at jwhyte@blm.gov or by phone at (303) 239-3708. In addition, the BLM established a project-specific website to provide ongoing information about the proposed project, including project details, current project progress, and avenues for communication. The website will remain a public information resource and will announce future public meetings and hearings. The website address is:

http://www.blm.gov/ca/st/en/fo/palmsprings/Solar_Projects/palen_solar_electric.html

Distribution List/Database

The mailing list for the Palen Solar PV Project used the BLM mailing list for the previous Palen projects. It then added the intervenors for the California Energy Commission Palen projects and additional interested parties identified by Riverside County. The mailing list/database was updated after the public meetings and the comment period and was reviewed to confirm all meeting attendees and all individuals, organizations, and agencies that submitted written comments were on the list. This mailing list will continue to be used throughout the environmental review process for the project to distribute public notices and will continue to be updated to ensure that all interested parties are notified of key project milestones.

2.2 Public Meetings

The BLM held public meetings on June 29, 2016, and August 4, 2016. The meetings provided an opportunity for the public, community and interest groups, and government agencies to obtain more information on the project, learn more about the NEPA and CEQA environmental review processes, ask questions regarding the project, and provide comment on the project.

Meeting Location

Table 1 presents information about the scoping meeting held for the PSP during the scoping period. Handouts and information materials available at the meeting are listed below:

- Notice of Preparation
- PowerPoint Presentation
- Self-addressed Comment Form
- Speaker Registration Card

Table 1. Public Scoping Meeting

Date and Time	Location	Signed-in	Speakers	Comment Letters
Wednesday, June 29, 2016 3:30 pm to 5:30 pm	Palm Springs Palm Springs City Hall 3200 East Tahquitz Canyon Way Palm Springs, CA 92262	26	6	7
Thursday, August 4, 2016 3:30 pm to 5:30 pm	Palm Springs Palm Springs City Hall 3200 East Tahquitz Canyon Way Palm Springs, CA 92262	12	3	7

Other information was made available for public review, which included an overview map of the project and a series of posters that showed the different technologies previously proposed at this site.

Press Release

The BLM prepared and issued a press release announcing the start of the public comment period and the date, time, and location of the two public meetings. The BLM submitted this notice online. The press release can be found on the BLM website.

Public Meeting Notice

The BLM distributed a scoping mailer to approximately 200 federal, State, regional, and local agencies, and elected officials, community and environmental organizations, Native American groups, and local property owners at least two weeks prior to both of the public meetings. Approximately 212 public meeting notices were distributed in preparation for the first public meeting held on June 29, 2016, and 182 public meeting notices were distributed for the second public meeting held on August 4, 2016. The notices, see Appendix A, included a brief description about the project and provided information regarding the date, time, and location of the public meetings. The mailing included the following approximate distributions:

Meeting 1

- 60 agencies (33 distinct)
- 31 environmental groups/organizations (26 distinct)
- 25 tribal governments (18 distinct)
- 80 local property owners
- 16 other interested parties

Meeting 2

- 59 agencies (32 distinct)
- 30 environmental groups/organizations (24 distinct)
- 33 tribal governments (19 distinct)
- 76 local property owners
- 13 other interested parties

3. Comments Received

This section summarizes the key issues raised during the public comment period. A total of 14 written comment letters were submitted and 8 individuals presented oral comments during the public scoping meeting. Appendix B of this report includes a copy of all comments received on the Palen Solar PV Project. The key issues raised by the commenters are discussed below.

3.1 Oral Comments

June 29, 2016, Meeting

The BLM held a public meeting for the Palen Solar PV project on June 29, 2016, at the Palm Springs City Hall Council Chamber from 3:30 to 5:30 pm. After a brief presentation, the BLM open up the meeting to general questions about the project and the NEPA process.

The general questions included:

- What types of panels would be used?
- Why did the water use during operations decrease to such an extent?
- How many permanent employees would there be?
- What is the source of the water used for dust control?
- The Supplemental EIS/EIR should consider the effects to the sand transport corridor. How would the project address this concern?
- What was the decision making process for a Supplemental EIS rather than a new EIS?
- Is there a PPA in place?
- How far down would the pylons go?
- Noted that the location is near the Ancient Palen Lake – there have been discoveries in this area, so updated cultural surveys would be recommended. Would there be consultation with the tribes prior to the updated surveys?

After the general questions, the BLM took public comments. Following are the summarized public comments.

Kevin Emmerich – Basin & Range Watch

Solar PV was not analyzed as part of the previous Palen projects. The Solar PEIS has some unresolved issues that would need to be addressed. PV is different from solar thermal and may have a bigger impact than parabolic trough. Concerns include:

- cultural issues;
- the Joshua Tree National Park;
- hydrology – PV would affect floods differently than the other technologies;
- birds – concerns regarding bird deaths in the Colorado flyway, recommends looking at the number of bird deaths; and
- sand transport, this size of a project would affect Mojave fringe-toed lizard and the source of the sand that is their habitat.

Basin & Range Watch has reviewed this project many times including providing alternatives.

Patricia Robles – La Cuna de Aztlan Sacred Sites Protection Circle

Ms. Robles stated that this was a poor idea for the desert, the Chemehuevi elders consider this area sacred and have deciphered petroglyphs throughout this area. She expects nation to nation consultation. In the past, this has been just a phone call and if no one answered then the consultation was over. She hoped the BLM learned from the past. Concerns include:

- Blythe as a recipient of dust from Genesis and other solar projects;
- the desert is being plowed up, ecosystems are destroyed and left as dust which is blown into the communities;
- environmental justice is an issue, especially with how many projects were originally proposed;
- desert bioregion is very important to the world, very hard to restore both plants and animal species and cultural resources;
- it is currently the 100th anniversary of the National Parks, and the JTNP is a gem of the desert. This project would impact the park.

Laura Cunningham – Basin & Range Watch

Basin & Range's goal is to preserve and conserve the desert. Ms. Cunningham wanted to know why the BLM was streamlining this process and why it eliminated a court reporter. She also requested that a distributed generation with storage alternative be considered.

Arlene Kingery – Quechan HPO

Ms. Kingery does not like that this document is a Supplemental EIS/EIR because the first document had many comments and was incomplete with lots of unresolved concerns. It did not address a lot of the issues. The Notice for the meeting did not address cumulative issues as a concern and the effects of the projects keep escalating. Issues include:

- closing the I-10;
- impacts to desert pavement;
- location is across from Corn Springs which is sensitive;
- would destroy habitat and when other projects have tried to relocate species it did not work;
- previous project's mitigation did not fix the concerns;
- substation brings more solar projects into this area that eliminate areas that are considered pristine and fragile; and
- requests a full EIS/EIR.

Joan Taylor – Sierra Club

Ms. Taylor previously opposed the solar power tower at this location, but the Sierra Club does not currently have a position on a PV project. Biological resource concerns include:

- this area is a blow sand corridor for the Mojave fringe-toed lizard;
- this is a desert tortoise corridor;
- grandfathering of a project means it is exempt from new rules; and
- lake effect of existing solar PV projects.

Lara Rozzell – National Park Service

NPS's role is as a cooperating agency for these processes. They protect the cultural heritage of the U.S. and look to avoid impacts to sensitive locations. NPS has no position on the PV project. Will be looking at:

- effects to sandscapes;
- movement;
- cumulative impacts; and
- how this project fits into the DRECP and the landscape.

August 4, 2016, Meeting

The BLM held a public meeting for the Palen Solar PV project on August 4, 2016, at the Palm Springs City Hall Council Chamber from 3:30 to 5:30 pm. After a brief presentation, the BLM open up the meeting to general questions about the project and the NEPA process.

The general questions included:

- Would the labor used be union or not union?
- Understand that the CEQA and NEPA plan is to supplement the previous documents. While this makes sense for the FEIS, the previous CEQA documents were very different from an EIR, how will this be used to complete a Supplemental EIR? The CEC CEQA process is not just the Staff Assessment but also all the testimony that goes into the record which includes hundreds of other documents. Will these other documents be part of the Supplemental EIR?
- Where can the public find more information about the financial information for EDF RE? What are the earnings and profitability? What is the company's history with other solar projects?
- EDF also proposed the Desert Harvest project. Is there a timeline for construction of that project?
- What is the transmission line right-of-way? Heard there was a 2-mile-wide corridor for transmission in this area. The solar projects add more to the overall transmission need in this area. Heard there would be a 110-mile transmission line.
- How can we get copies of the presentation?
- Who is the lead at the BLM, there have been many changes to the BLM staff?
- Is the transmission line overhead?
- Is Aspen working on other projects in the desert?
- At the last meeting people felt like the process should start over. Is there a written document that explains how the process was determined and when it started?

After the general questions, the BLM took public comments. Following are the summarized public comments.

Lisa Belenky – Conservation for Biological Diversity

Concerns included:

- does not like how the previous documents were completed, especially the Energy Commission Staff Assessment. The record was disorganized and it was hard to find information, in particular the information for the Mojave Fringe-toed Lizard (MFTL).

- recommends the NEPA/CEQA use the Colson report on sand transport from the original Staff Assessment. It is important to discuss semi-stabilized and stabilized dunes as they are also important to the MFTL.
- need to consider alternatives that avoid the sand transport corridor.
- should review the testimony of Al Muth (CBD), Eileen Anderson (CBD), and Pat Flanagan (Morongo Basin Conservation Association).
- this area is not a desolate area, includes good habitat.
- an alternative should be considered that fully avoids the MTFL habitat and washes.
- also concerned about desert tortoise connectivity, some connectivity areas near the I-10 were identified. There is testimony on the use of the underpasses.
- POD is on the website but the Appendices are not. Should be uploaded.
- concerned with the short timeframe for the project, should consider all the significant resources and the DRECP will soon be finalized which will add additional limitations in the area.

Jason Theue – Joshua Tree National Park Chief of Cultural Resources

The park has concerns about no formal scoping. They are also concerned about Section 106 and whether the list of recipients on the letter were a list of the full distribution of tribes who received consultation. The list provided seemed inadequate.

Section 106 effects should be considered on a landscape scale and include the entire region. The historic resources belong to large districts. If there are elements that would be impacted by the project, they are connected to the Park.

Amanda Barrera – Colorado River Indian Tribes

Ms. Barrera is the council secretary for the CRIT. The developers continue developing the desert and tribes come forward with issues that come up, such as what happened in Genesis. California is part of the tribal area for the CRIT. The projects are disturbing areas important to the tribes. In 1980, the tribes participated in a Master Plan with the BLM, but they were not consulted for these projects until too late, such as with Genesis. Tribes were only consulted after thousands of elements were found. The CRIT understands that solar is coming, but developers need to consider the impacts to native peoples. The footprint of the native people is much larger.

3.2 Written Comments

Public Agencies

The Metropolitan Water District of Southern California

The project plans to construct up to ten on-site groundwater wells. Since the Metropolitan Water District owns and operates the Colorado River Aqueduct and is a contractor receiving water delivery of Colorado River supplies, it is concerned that the project could result in direct and cumulative impacts on the water supplies, specifically on the Colorado River and local groundwater. In light of the drought conditions in the region of the Proposed Project, the Metropolitan Water District requested that the new Supplemental EIS/EIR discuss projected impacts to water resources, including Colorado River resources, on a local and regional level.

The letter included copies of the comments the agency provided for the previous iterations of the Palen project.

U.S. Environmental Protection Agency (EPA)

The EPA's primary concerns regarding the Palen Solar PV Project pertain to the potential impacts to site hydrology, air quality, biological resources, and the cumulative impacts related to the increasing number of projects in the Riverside East Solar Energy Zone.

The EPA requests that the analyses of key resources, consultation with tribal governments, and the identification of compensatory mitigation lands be completed as soon as possible to determine the viability of the project and to avoid potential project delays. The EPA encourages the Applicant and the BLM to collaborate with the U.S. Fish and Wildlife Service to protect habitat connectivity for the desert tortoise and other sensitive species and identify appropriate land for habitat compensation and that the Applicant avoid on-site drainages as much as possible. The agency recommends that the Draft Supplemental EIS describe and estimate the direct and indirect impacts of project components and fencing on stabilized and partially stabilized dunes, sand transport corridors, and the local ecosystem.

In addition, the EPA listed specific recommendations pertaining to the Project SEIS/SEIR, including:

- the need for a clean, objective purpose and need;
- a description regarding how each alternative was developed, how it addresses project objectives, and how it would be implemented;
- considering a "desert or ephemeral wash avoidance" alternative for full evaluation in the SEIS/SEIR;
- a discussion regarding the applicability of the DRECP and Solar PEIS;
- a jurisdictional delineation, characterize the functions of aquatic features impacted by the project, and discuss water needed for the project and where it will be obtained;
- providing a detailed discussion of ambient air conditions and estimate emissions of criteria pollutants;
- consultation with U.S. FWS and preparation of a Biological Opinion;
- including a draft of key biological resources plans such as an Avian Protection Plan, Raven Monitoring, Management, and Control Plan, etc.;
- the potential for habitat fragmentation and obstructions to wildlife movement;
- including information regarding compensatory mitigation proposals;
- discussing impacts to sand dunes and its ecosystem;
- including a discussion regarding avian mortality at utility-scale solar sites;
- addressing impacts to local ecosystem climate change adaptability as a result of the project;
- discussing the impacts associated with an increase in the amount of shade in the desert environment on vegetation and/or species;
- assessing the impacts of climate change on the project;
- including a requirement for a decommissioning and site restoration plan;
- describing the process of government to government consultation and address the existence of Indian sacred sites in the project area;
- including an evaluation of environmental justice populations;
- evaluating the potential glint and glare to motorists on the Interstate 10; and
- analyzing whether ground-disturbing activities related to the Project will result in the dispersal of *Coccidioides* (Valley fever) spores and including measures to prevent or minimize exposure of the spores to workers and local residents.

Joshua Tree National Park

The Joshua Tree National Park agreed to serve as a Cooperating Agency for the Supplemental EIS in response to the BLM's letter. The agency anticipates that the construction of the Palen Solar PV Project will result in adverse impacts to the visual resources of Joshua Tree National Park and neighboring Wilderness Areas in addition to adverse impacts to historic, natural, and cultural resources in the national park and surrounding areas.

As a consulting party under Section 106 of the National Historic Preservation Act (NHPA), the National Park Service (NPS) is concerned about impacts to historic properties in the Joshua Tree National park. The NPS encourages the BLM to participate in a landscape-scale dialogue with NHPA Consulting Parties to discuss the impact the Project will have on the integrity of non-visible historic sites unique to the area.

The NPS is also concerned about the impact the Project will have on wildlife listed as a threatened species under the Endangered Species Act in the area, including desert tortoise. In particular, the NPS is concerned about the increase in the presence of the common raven as a result of an increase in human activity and presence in the area of the Project site and the resulting predation of desert tortoises.

California State Transportation Agency – District 8

The California Department of Transportation District 8 Staff attended one of the Public Meetings for the revised Palen Solar PV Project and notes that the Public Meeting Notice states that the Supplemental EIS/EIR will incorporate and update environmental topics including Transportation and Public Access. The Department requests that a copy of the Supplemental EIS/EIR be forwarded to the Office once it is available.

Groups, Organizations, and Companies

Basin & Range Watch

Basin & Range Watch expressed concern that the changes to the solar technology through the multiple iterations of the Palen project has not eliminated impacts to hydrology, biological resources, cultural resources, visual resources, and air quality. Moreover, the organization is concerned that the BLM has not properly analyzed the impacts of photovoltaic solar technology on the surrounding area in detail. In particular, there are concerns that the design, placement, and shape of the panels can affect sand transport and hydrology flooding patterns in the area.

Basin and Range Watch expressed their opinion that the Palen Solar PV Project should not receive streamlined approval due to the fact that it is in a Solar Energy Zone. The organization requests that the project analysis begin anew with the preparation of a full EIS/EIR and a full scoping period with another two public meetings. In addition, they request that there be a scoping meeting in Blythe, CA, which is closer to the Native American communities most affected by the project.

The organization also requests that the BLM consider including in the Purpose and Need Statement a need to protect cultural, biological, hydrological, and visual resources and air quality, as well as a need to protect resources on the site and in the Chuckwalla Valley. Moreover, they encourage examining solar energy alternatives to the Palen Solar PV Project, such as distributed generation and brownfield alternatives, that are similarly productive, but less damaging, to cultural and biological resources.

Regarding environmental consequences, Basin & Range is concerned with:

- air quality and dust control in this climate including *coccidioidomycosis* (Valley Fever);
- impacts to Mojave fringe-toed lizards and their habitat;
- avian mortality and the lake effect;
- desert kit fox and K9 distemper;
- altering the drainage at the site could cause flooding;
- impacts to cultural resources and tribes; and
- impacts to visual resources.

National Parks Conservation Association (NPCA)

The NPCA requests that the following topics, in particular, be fully analyzed in the Supplemental EIS/EIR:

- the impact of solar PV panels and the “lake effect,” wherein birds mistake the reflection of solar panels for the surface of a lake, on local and migrating bird populations;
- the impact of disturbances caused by the construction of project infrastructure on sand transport corridors and habitat connectivity that can impact fringe-toed lizards and desert tortoises;
- the impact of the disturbance of desert soil and the creation of fugitive dust on Joshua Tree National Park and the Coachella Valley;
- the overall impact of the Proposed Project on the Native American cultural landscape as a whole;
- the direct, indirect, and cumulative impacts of the Palen Solar PV Project and other projects in the area on the local hydrology;
- the direct, indirect, and cumulative impacts of the Palen Solar PV Project on scenic vistas within Joshua Tree National Park; and
- the consideration and analysis of alternative renewable energy technologies that would be less harmful to visual resources, wildlife, and cultural resources and alternative locations.

Center for Biological Diversity (CBD)

The CBD expressed concern with the lack of clarity on the part of the BLM and Riverside County regarding the solicitation of public input into the Supplemental EIS/EIR and the utilization of outdated environmental review documents from the previously proposed projects at the Palen site for the preparation of the Palen Solar PV Project Supplemental EIS/EIR. The organization recommends that the BLM take a fresh look at the proposal and alternatives since the BLM had never approved the earlier proposals for a ROW for a utility-scale solar project at the Project site.

The CBD requests that the following issues are addressed by the BLM in the SEIS/SEIR:

- the consideration of the updates to NEPA guidance and the Desert Renewable Energy Conservation Plan (DRECP);
- careful scrutiny of documents to be used for tiering under CEQA and the inclusion of a later environmental review undertaken by the California Energy Commission (CEC),
- the importance of unobstructed wind and sand transport corridors to the local ecosystem and sensitive local species;
- avian impacts related to migratory birds colliding with solar PV panels due to the “lake effect;”
- desert kit fox impacts related to the increase in canine distemper due to passive relocation from solar sites;
- Mojave fringe-toed lizard impacts;

- impacts to local invertebrates;
- maintaining adequate movement corridors for local wildlife;
- surface hydrology impacts;
- impacts to soils and other resources from loss of Cryptobiotic crusts and desert pavement;
- cultural resource impacts; and
- analyses of other solar alternatives such as roof-top distributed solar.

The CBD included the following attachments to its comment letter:

- Attachment 1: Collision, Appendix A Soil and Water.
- Attachment 2: List of Center exhibits from CEC process (with TN#s and links for retrieval from CEC site).
- Attachment 3: CWG Workshop slides: # 37-56 only.
- Attachment 4: CDFW proposed kit fox measures
- Attachment 5: NREL 2016 Report

Morongo Basin Conservation Association (MBCA)

The MBCA expressed concern that the air quality monitoring data gathered in Palm Springs and Indio is not accurate or reliable for this project. The organization requests that the BLM require particulate matter monitoring be completed for the Supplemental EIS/SEIR analysis and in the determination of the “Affected Environment and Environmental Consequences” sections of the document for the Palen Solar PV Project and for all future solar projects within the DRECP Development Focus Areas (DFA).

Tribal Governments & Organizations

Chemehuevi Cultural Center

Dr. Jay Cravath from the Chemehuevi Cultural Center stated that the Center had no specific comments regarding the Palen Solar PV Project. However, he requested that, if any evidence of cultural resources is discovered during the construction of the Palen Solar PV Project, all activity be ceased and the Center notified immediately.

La Cuna de Aztlan Sacred Sites Protection Circle

The Protection Circle expressed concern as to what they believe is the BLM’s disregard for indigenous sacred sites, as shown by the BLM’s continued consideration of proposed solar projects at the Project site.

The organization is against large solar projects being developed along the Interstate-10 corridor in eastern Riverside County because the development of just one solar project in that area will impact the interconnected network of local sacred sites that are important to the local Native American Creation Story. The comment letter notes that the Chuckwalla Valley is a major prehistoric and ethnographic transportation corridor in the Western Hemisphere and provides a brief explanation regarding the sacred sites in the region.

In addition, the organization is concerned about the negative impact the presence of solar facilities will have on Poorwill birds, which are regarded as a sacred animal to several tribes, that hibernate in the area as well as the extra strain solar power projects will put on the drought-induced low local water supply.

Private Citizens

Anco Blazev

Mr. Blazev inquired as to the type of solar panels (mono-, poly-silicon, CdTe, CIGS, etc.) that will be included in the Palen Solar PV Project.

Scott Connelly

Mr. Connelly requests that the Palen Solar PV Project impacts to the following topics be identified and included in the analysis of the Supplemental EIS/EIR:

- endangered and special status species;
- desert dune ecosystems;
- wildlife corridors;
- the effect of project fences on sand movement and local ecosystems;
- important plant species and vegetation alliances associated with dune and playa systems;
- hydrology;
- the type of PV panels to be installed and their reflective factors;
- birds using the Pacific flyway;
- visual resources;
- light pollution;
- air quality;
- cultural resources; and
- unavoidable, adverse, irreversible, or cumulative effects of the PSP.

Moreover, he encourages the BLM to develop a new EIS and to organize a formal scoping meeting.

Kenneth B. Waxlax

Mr. Waxlax expressed his belief that conservation easements and land purchases are key to land preservation. In addition, he believes that purchases of parcels of land for mitigation and conservation should occur in interconnected areas beyond where sensitive species inhabit to take into consideration climate change and subsequent range shifts.

Pertaining to the Palen Solar PV Project, Mr. Waxlax notes that the site is bordered by a farm, a race track, a freeway, and two 500 kV power lines, and two fully built solar projects and a permitted solar project so should not be considered pristine desert.

He requests that an update to the effect of the project on the viewshed from Joshua Tree National Park be examined and that a study be done on the effect of the rotating solar panels on drivers on I-10. Moreover, he requests that the sand transport system in the area be reviewed in relation to the project and that any adverse effects be mitigated through the purchase of nearby sand sources and dune lands for conservation. In addition, he requests that an analysis of the actual use of the wildlife corridor under the freeway by desert tortoises be done and that this information be reflected in the Supplemental EIS/EIR.

He notes that all energy production has impacts.

Donna J. Charpied

Ms. Charpied is particularly concerned with avian mortality caused by the “lake effect” of solar photovoltaic panels. She expressed concern in the lack of public information and records released by the solar PV industry pertaining to the number of bird deaths associated with solar PV technology and the reluctance of those in the industry from fully analyzing the correlation between the increase in bird deaths and the increase in solar PV facilities in the area. Ms. Charpied provides an example of bird strikes at the Desert Sunlight Project that she saw from her property.

Patrick Donnelly

Mr. Donnelly expressed concern that the previous EIS and SEIS prepared for the PSPP and PSEGS, respectively, are outdated and limited in their scope about the impacts of utility-scale development. As such, he proposes that new biological, cultural, and hydrologic surveys be completed in order to properly assess the impacts of the Palen Solar PV Project.

He is particularly concerned about the impacts of the project on the hydrology of the area, including the springs, seeps, and groundwater-dependent vegetation in the area surrounding the project site. According to Mr. Donnelly, previous solar developers have underestimated their total water consumption needs, which therefore makes it imperative that the Palen Solar PV Project conduct more surveys to more accurately analyze their water needs compared to the amount of water available in the Chuckwalla Valley.