

**MORONGO BASIN CONSERVATION ASSOCIATION**  
P.O. BOX 218, TWENTYNINE PALMS, CA 92277  
INFO@MBCONSERVATION.ORG WWW.MBCONSERVATION.ORG

July 11, 2008

*Delivered via electronic mail as well as U.S. Postal Service*

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:

We appreciate the opportunity to comment on the Solar Energy Development Programmatic Environmental Impact Statement (PEIS).

The Morongo Basin Conservation Association (MBCA) has been pursuing its mission to protect the economic and environmental health of the Morongo Basin since 1969, when it was founded during a successful 11-year campaign to avert the imposition of power lines through the Basin by Southern California Edison. In the process, MBCA was instrumental in the development of the concept of designated transmission corridors as were eventually included in the California Desert Conservation Act plan, with the goal of avoiding a proliferation of utility lines across the desert.

The members of MBCA continue to seek to preserve and protect desert resources and the interests of desert communities and thereby request you to accept the following scoping comments:

1. The PEIS must thoroughly analyze potential economic, material, and nonmaterial impacts to desert communities if the greater desert areas are industrialized with solar energy and transmission projects. Many desert communities depend economically on location- and resource-reliant industries such as tourism; location shooting for film, television, and advertising; recreation, both motorized and nonmotorized; and other cultural activities such as art, historical, and spiritual tours and retreats. Loss of greater-desert viewshed and open space means loss of livelihood for desert communities. Desert communities also increasingly rely on the aesthetic and environmental quality of their setting to attract today's increasingly mobile workforce that has become less geographically tethered and can choose where they live. Retirees are also a significant part of our communities that can choose where they live based on natural amenities and appeal. Therefore, our property values depend on those amenities and that appeal. A diminishment in the quality of desert life will mean income directly lost and future potential thrown away for

our communities. Desert towns will lose their meaning, their heart, and their health if the surrounding desert is essentially “taken away” by industrialization.

2. The PEIS should include a thorough survey of impacts to potentially culturally and historically significant lands, including areas developed as part of the historic 1938 Small-Tract Homestead Act that shaped many of the outlying, low-density communities in the Morongo Basin and elsewhere in the Southwest deserts. These unique communities in some cases lie largely intact, but their cultural and historical significance is only recently becoming recognized. Refer for example to the 2008 Wonder Valley Homestead Cabin Festival, which generated interest and participation from its cousin homestead-based communities such as Landers and Johnson Valley (<http://homesteadcabin.wordpress.com/>) and was featured in the 2008 Architectural Annual issue of Dune Magazine.
3. The PEIS should include consultation with Native American tribal governments to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance.
4. The PEIS should study the impacts of increased vehicular traffic and congestion on desert communities, environmental resources, road infrastructure, and public safety during both construction and operational phases of solar and transmission development.
5. The PEIS should study the impacts of worker populations on sensitive desert resources during both construction and operational phases of solar and transmission development.
6. The PEIS should study the impacts on resources that would follow from the introduction of new routes, in view of the known problems caused by off-road vehicle activity and the “invitation” effect of new routes.
7. The PEIS should study impacts on limited water resources and the effects of competition with desert communities, as well as biological communities, for those resources.
8. The PEIS needs to include the proposed expansion of the Marine Corps Air-Ground Combat Center when considering cumulative and long-term impacts.
9. The PEIS needs to consider how the desert communities’ own energy needs will or will not be served by these projects.
10. The PEIS must thoroughly analyze the socioeconomic, security, and environmental effects of remote installations versus locally distributed power and consider alternatives that focus renewable energy development close to the load centers. The impacts and benefits of a comprehensive program involving rooftop solar across the developed Southwest, as well as additional potential energy alternatives, must also be thoroughly analyzed and considered. To single out the desert to bear the brunt of providing energy for the urban areas is an ENVIRONMENTAL JUSTICE issue. To demand sacrifice only of the desert areas and not the load areas is not acceptable!
11. Areas that have already been degraded should be prioritized for consideration for solar and transmission development. No public lands that are basically still relatively undisturbed should be considered for solar energy or transmission use until all degraded lands have been utilized.
12. Removed from any consideration for solar and transmission development should be all protected lands, such as national and state parks, monuments, and preserves; environmentally significant areas such as Designated Wildlife Management Areas and Areas of Critical Environmental Concern; and lands with significant environmental

resource potential such as Wilderness Study Areas, other lands with wilderness characteristics, and areas that are under consideration as potential wildlife corridors.

13. The PEIS must include a programmatic evaluation of cumulative impacts to Endangered and Listed species, especially the Desert Tortoise.
14. The PEIS must study the potential of construction and operational phases to introduce or encourage invasive vegetation, including *Brassica tournefortii* or Saharan Mustard, not just at project locations but throughout the desert areas, as vehicles are one of the biggest culprits for spreading invasives.

We thank you for this opportunity to comment. We are submitting these comments via both the website and also via U.S. Mail. Please include our organization on the mailing list for all future communications regarding the Solar PEIS. Electronic communication may be sent to [info@mbconservation.org](mailto:info@mbconservation.org). If disk copies of documents are made available we would request that we receive those rather than being left to depend on Website access, as many parts of our rural membership area receive only dial-up service. Those should be mailed to MBCA at P.O. Box 218, Twentynine Palms, CA 92277.

Sincerely,

David Fick,  
President