



**OFF-ROAD BUSINESS ASSOCIATION, Inc.**

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*Re: Comments for Consideration and Inclusion in the Scoping Process for the proposed Chevron Energy Solutions/Solar Millennium Palen and Blythe Solar Power Plants*

Dear Mr. Soloman and Ms. Shaffer:

Thank you for the opportunity to provide scoping comments on Chevron Energy Solutions/Solar Millennium Palen and Blythe Solar Power Plants. I am writing on behalf of the Off-Road Business Association (ORBA) a national non-profit trade association representing all aspects of the motorized recreation industry – from OEM manufacturers to aftermarket suppliers and distributors, and local retailers including many located in Riverside County California.

As described by the BLM Chevron Energy Solutions/Solar Millennium Palen and Blythe Solar Power Plants is proposing to construct and operate two solar thermal power plants with an expected combined capacity of 1,452 megawatts, using commercial solar parabolic trough generating stations. Approximately 10,100 acres of BLM land is needed for this facility. The Palen site is 10 mile east of desert Center, California and half a mile north of Interstate 10. The Blythe site is eight miles west of Blythe, California and three miles north of Interstate 10.

We would like to provide the following comments with respect to the proper scope of the proposed Draft Environmental Impact Statement (EIS) and Staff Assessment (SA).

## **SPECIFIC COMMENTS**

The Draft EIS/SA must evaluate many impact categories in order to meet the goals specified in NEPA, CEQA and their respective implementing regulations. These include the following:

**Recreational Activities** – The Draft EIS/SA must evaluate the project's potential impacts on the recreational uses in the area including, but not limited to, off-highway vehicle (OHV) use, camping, photography, hiking, wildlife viewing and rockhounding. In order to conduct a proper analysis of the project's impacts on recreation, the BLM must first determine the number of users, the value of the affected land for recreational purposes, and the need to locate and acquire replacement venues for the recreational lands lost as a result of the project.

**Indirect Recreational Impacts** – The Draft EIS/SA must evaluate the project's indirect impacts caused by displacing recreational users including, but not limited to: (1) the increased enforcement required at other sites when displaced recreational users seek out other areas that may be poorly identified as wildlife preserves or other resource rich areas; (2) the loss of biological resources or habitat at other sites that displaced recreational users may utilize; (3) the loss of nature education; (4) the loss of outdoor recreation opportunity; (5) the loss of outdoor access and experiences for children in the community; (6) the loss of familial traditions, custom and culture of recreational and nature oriented activities in the region; (7) the loss of the region's history and traditions, specifically with respect to mining and recreational activities.

**Cumulative Loss of OHV Recreational Areas** - The Draft EIS/SA must evaluate the cumulative losses of land available for OHV recreation, including, but not limited to, the cumulative closures or limitations on desert lands managed by BLM and on forest lands managed by the U.S. Forest Service.

**Local Economic Impact** – The Draft EIS/SA must evaluate the economic impacts caused by the project's construction, implementation, and operation. This evaluation must address (1) the economic impacts on the local community caused by the loss of commerce created by recreational users to the area including gasoline, grocery and equipment purchases; (2) the economic impacts on businesses that sell OHV's and OHV-related equipment – such as motorcycles, ATV's, UTV's, dune buggies, motorhomes, trailers and their associated tow vehicles.

**Reclamation Plan** - The Draft EIS/SA must include a "reclamation plan" for the eventual return of these lands to public use. This plan needs to ensure that if the applicant, for any reason, chooses to abandon the project that the land will be returned to public use in as close to its original condition as possible. The "reclamation plan" should also include provisions for returning the land to public use after the term of the right-of-way has expired.

**Water Supply** - The Draft EIS/SA must evaluate the project's impact on available water supplies. Such an evaluation must take into account water required for dust control, fire prevention and containment, vegetation management, sanitation, equipment maintenance, biological preserve land, construction, human consumption, and any other project uses.

**Visual Impacts** - The Draft EIS/SA must evaluate the project's aesthetic and visual impacts on the region, including the fact that visitors to the area will have a greatly reduced outdoor experience because of the project. The lands affected by the project are currently wild, open,

and undeveloped. That will change when the project is constructed, thus altering the landscape and diminishing the wilderness experience of visitors to this area.

**Biological Impacts** - The Draft EIS/SA must evaluate the project's potential to create direct, indirect, and cumulative biological impacts, including, but not limited to impacts on endangered and threatened species.

**Consistency with Land Use Plans** - The Draft EIS/SA must evaluate the project's consistency with existing land use and regulatory plans, including examination of impacts of on those plans. This includes reviewing the project's consistency with the regulations set forth in Executive Order 11644, signed on February 8, 1972, which allows for use of off-road vehicles on the public lands.

**Environmental Justice** - The Draft EIS/SA must evaluate whether the project's environmental burdens (including diminished recreational access) are being placed disproportionately on individuals and/or groups who, due to their socio-economic status, have insufficient resources to challenge the proposed project.

**Archeological, Cultural and Historic Impacts** - The Draft EIS must evaluate potential impacts on archeological, cultural, and historical resources in the vicinity of the project, including, but not limited to: (1) Native American resources, burial sites, and artifacts; and (2) historical mining operations and related artifacts.

## **CONCLUSION**

In order to provide the public with an adequate understanding of the project's impacts, the Draft EIS/SA must address the issues described in this letter. We thank you for this opportunity to comment on the scope of the Draft EIS/SA.

Please consider this our formal request for inclusion on the EIS/SA mailing list. Send all documents and updates to: Meg Grossglass 32383 Perigord Rd, Winchester, Ca 92596.

Sincerely,

Meg Grossglass