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DOCKET	
08-AFC-13	
DATE	_____
RECD.	Jul 20 2009

Jim Stobaugh
National Project Manager
Bureau of Land Management
Division of Lands, Realty & Cadastral
BLM Nevada State Office
P.O. Box 12000
Reno, NV 89520-0006

Re: Comments for Consideration and Inclusion in the Scoping Process for Tessler Solar's Proposed "Calico-Solar One", San Bernardino, CA (08-AFC-13)

Dear Mr. Meyer and Mr. Stobaugh:

Thank you for the opportunity to provide scoping comments and an impacts statement on the Tessler Solar – Calico/Solar One Project located east of Barstow, California (the "Solar One Project"). 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 in the Southern California region. I am also writing on behalf of EcoLogic Partners, Inc. ("EcoLogic"), a non-profit organization dedicated to preserving public access to recreational lands throughout the United States.

As described in official publications of the California Energy Commission (CEC) and the Bureau of Land Management (BLM), Tessler Solar would like to install a solar energy collection and transmission facility on approximately 8200 acres of public land northeast of Barstow, California, directly north of Interstate 40. The project will consist of 34,000 25-kilowatt power dishes, each 38' (H) by 40' (W). The project is expected to generate enough energy to serve 600,000 people annually. We have reviewed the description of the Solar One Project and provide the following comments with respect to the proper scope of the proposed Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR).

SPECIFIC COMMENTS

The Draft EIS/EIR 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/EIR must evaluate the Solar One 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, CEC and 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/EIR 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/EIR 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.

Reclamation Plan – The technology proposed in this project has yet to be used for large scale utility purposes. As a result the Draft EIS/EIR 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/EIR 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/EIR 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 with man-made structures. That will change when the project is constructed, thus altering the landscape and diminishing the wilderness experience of visitors to this area of the California desert.

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

Consistency with Land Use Plans - The Draft EIS 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 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.

Alternatives - The Draft EIS must evaluate and analyze feasible alternatives to the proposed project that "would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R. § 1502.1, 1508.25 (b)(2) and (c). The Draft EIS should evaluate the alternatives identified below. However, before describing these alternatives to the project, we would first like to describe what we perceive to be the project's most significant impacts on public recreation, as these impacts are what drive the need for project alternatives.

Impacts. There will be a substantial loss to the recreation community if this project is approved. Currently the only legal access to that area is via the road (un-named on BLM DAG maps) that is located north of the railroad tracks and running parallel to the railroad tracks. This un-named road intersects with the power line road that borders the project to the east. Assuming that the entire project area will be fenced when it is completed, access to the recreation area to north and west via this road will be lost. Our surveys indicate that the project, if approved as proposed, would result in the complete or partial loss of 7 trails that lead into the Cady Mountain Area. ORBA and EcoLogic members have historically used this area for OHV recreation, rockhounding, hiking, wildlife viewing, camping and photographing. Please ensure that this impact, including the mitigation for it, is analyzed in the EIS/EIR.

Alternative 1: Continued Recreational Access Alternative. The Draft EIS/EIR should evaluate an alternative that allows for continued public access to the Cady Mountain Area to the north and east of the proposed project by allowing public access to and from the un-named road referenced above.

Alternative 2: Release of Other Recreation Land Alternative. The Draft EIS/EIR should evaluate alternatives that would release for public use other BLM land currently not open to recreation. This would partially alleviate the loss of recreational uses in the Cady Mountain Area resulting from the proposed project.

Alternative 3: Razor OHV Area Expansion Alternative. The Draft EIS/EIR should consider an alternative that would expand the existing Razor OHV Area to the north and west.

Alternative 4: Open Soda Mountain Wilderness Study Area Alternative. The Draft EIS/EIR should consider an alternative that would release all or a portion of the Soda Mountain Wilderness Study Area into open public use, including OHV recreation, and possibly designating more routes of travel in the area. The data indicate that this study area does not, and likely will not, meet the established criteria for a formal "Wilderness" designation. It should therefore be removed from "study" and returned to the active public domain where it can be integrated into existing use plans.

CONCLUSION

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

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

Sincerely,

Meg Grossglass