

## Docket Optical System - Comments on Palen Solar Power Project DEIS

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**From:** Brendan Hughes <jesusthedude@hotmail.com>  
**To:** <capssolarpalen@blm.gov>, <asolomon@energy.state.ca.us>  
**Date:** 7/1/2010 6:43 PM  
**Subject:** Comments on Palen Solar Power Project DEIS

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To whom it may concern:

My name is Brendan Hughes and I would like to comment on the proposed Palen Solar Power Project Staff Assessment/Draft EIS. I encourage BLM and CEC to choose the No Action Alternative and amend the CDCA Plan to place this area off-limits to future development. This project will have immitigable impacts to biological and visual resources. Additionally, viable alternatives exist that will not destroy intact desert habitat.

The proposed project will have negative impacts on several endangered or special-status species. This project will destroy 210 acres of the Chuckwalla Critical Habitat Unit for the desert tortoise. Additionally, it will destroy thousands of acres of suitable habitat for desert tortoises. These are unacceptable impacts to a federally-threatened species. The cumulative impacts of all of these solar projects on desert tortoises could lead to the demise of the entire species in the wild. CEC should not enable the extirpation of the California state reptile. Furthermore, habitat will be lost for the Mojave fringe-toed lizard and the burrowing owl, which are sensitive species, as well as many other important plants and animals. This project will also hinder the creation of new Mojave fringe-toed lizard habitat by obstructing sand movement in the northern Chuckwalla Valley. As BLM and CEC staff acknowledge, the biological impacts of this project are immitigable, and therefore it should be denied.

Severe impacts will also occur to the visual resources of the area, including the Coxcomb Mountains and Eagle Mountains of Joshua Tree National Park, and the Palen-McCoy, Chuckwalla, and Little Chuckwalla Mountains Wilderness Areas. I have hiked in the Palen-McCoy and Little Chuckwalla Wilderness Areas, and I enjoyed the vast, unconfined landscapes that I observed during those hikes. A project such as this would taint future hikes and reduce my ability to enjoy the California Desert.

Finally, CEC staff identified a "Desert Center" Alternative that would be sited on and in the vicinity of former agricultural fields. I suggest that, if a utility-scale plant needs to be constructed, CEC should only authorize siting to occur on previously-disturbed agricultural land. Very little, if any, undisturbed desert should be required to build such a plant. Solar Millennium should be able to work within these limits. Smaller solar plants are perhaps even more viable than larger ones, as the current Harper Dry Lake and Kramer Junction solar fields demonstrate. CEC should begin encouraging applicants to use previously-disturbed land, and deny outright applications for intact, viable desert habitat.

Again, I would like to ask BLM and CEC to choose the No Action Alternative for this project, and amend the CDCA plan to place this area off-limits to future development.

Thank you for your consideration.

Brendan Hughes  
 61093 Prescott Trail  
 Joshua Tree, CA 92252

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