
SOLAR ENERGY DEVELOPMENT
SUPPLEMENT TO THE
PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT
(PEIS)
PUBLIC MEETING*

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Palm Desert, California

* This transcript has been modified by Argonne National Laboratory to correct any obvious grammatical and transcription errors.

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C O N T E N T S

P R O C E E D I N G S

MS. HARTMANN: The first speaker signed up is Elizabeth Cross. Is Elizabeth here?

Okay. And I apologize if I mispronounce any last names. Stephanie Dashiell?

MS. DASHIELL: Dashiell.

MS. MANN: Could I give you guys a reminder, too, please? We have this lovely lady in the corner who is our court reporter. If you were here at our last meeting, it was very difficult for our previous reporter to capture what the audience was saying if there's any background information. So speak clearly and slowly because she doesn't want to miss a word.

MS. HARTMANN: Yes. And say your name. That helps, too.

MS. DASHIELL: My name is Stephanie Dashiell, and I'm here representing Defenders of Wildlife as their California Desert representative.

I just want to thank BLM for holding this and for the opportunity to provide public input on the Supplement to the Draft Solar PEIS.

The Supplement to the Draft Solar PEIS is an important step in meeting both the renewal energy policy goals and protecting our natural and biological resources. Specifically, the Supplement has correctly

removed the two high-conflict zones in California, both Iron Mountain and Pisgah.

While we support the BLM effort, there remain opportunities to strengthen the proposed program to ensure that wildlife and natural resources are protected and that siting is smart from the start.

First of all, BLM must work to ensure that solar energy development, both in and out of the solar energy zones, is consistent with BLM's wildlife policy and that effective mitigation measures are adopted and adequately enforced.

BLM should exclude from all future development the areas deemed unsuitable as solar energy zones because of wildlife and resource conflicts, including the Pisgah zone, not just the Iron Mountain zone.

In the case of California, both Iron Mountain and Pisgah should be excluded from the solar energy development to prevent further degradation and habitat fragmentation by piecemeal solar development authorized through the variance process.

The Supplement correctly reduces the Riverside East Solar Energy Zone by approximately 43,000 acres. However, the proposed area still contains important habitat, such as microphyll woodlands and

numerous washes.

Siting lands outside of solar energy zones through the variance process should take into consideration species habitat and habitat linkages for endangered species, such as bighorn sheep, desert tortoise, among others.

Under the variance process, there remains, as mentioned previously, 20 million acres of land outside of the zones, 1.3 acres in California, which are still open to solar development.

While incentives exist to guide development to the zones predetermined, further efforts should be made to guide development to degraded land, such as brownfields and old mining sites, which are not currently included in the solar energy zones, and away from sensitive desert lands.

Lastly, BLM should exclude more land from consideration under the variance process, specifically lands designated under the California Desert Conservation Act as wildlife habit management areas, lands with unique plant assemblages, and limited multiple use areas should be excluded.

Thank you for this opportunity to express our concerns and opinions on the BLM solar energy program. I'll conclude there.

MS. HARTMANN: Thank you, Stephanie.
Next we have Joan Taylor. Is Joan here?
PARTICIPANT: She couldn't make it.
MS. HARTMANN: Oh. Then Paul Smith?
MR. SMITH: I'm here, but I wasn't scheduled to talk. It was another Paul Smith.
MS. HARTMANN: Must be. Okay. Victoria Fuller.
MS. FULLER: I submitted mine online.
MS. HARTMANN: Oh, thank you, Victoria.
Seth Shteir. And is Brendan Hughes here? Okay. You'll be next then.
MR. SHTEIR: Good evening. My name is Seth Shteir, and I'm representing National Parks Conservation Association tonight.
The mission of my organization is simple. It's to protect and enhance America's national parks for present and future generations.
I'd like to thank both the Bureau of Land Management and the Department of Energy for the opportunity to make comments about the Solar PEIS Supplement.
I'd like to make the following points regarding the new Supplement. It's very important to invest in a renewable energy future to help buffer us

from climate change and to help us to become an energy independent nation, but we must do so in a way that does not jeopardize our national parks, wilderness, and other ecologically sensitive lands.

The best sites for renewable energy development are on disturbed lands and brownfields, not on areas that are wildlife corridors, support rare native plants and animals, house significant cultural or historical resources, or have significant recreational values.

While the California Desert may be an attractive place to site renewable energy development from a developer's point of view, we shouldn't be asked to share a disproportionate burden for the rest of the country.

Here's some positive aspects I think of the new Solar PEIS Supplement. One is the elimination of the 106,000-acre Iron Mountain Solar Energy Zone to the northeast of Joshua Tree National Park. That's definitely a step in the right direction in protecting environmentally sensitive lands and making renewable energy truly smart from the start.

Another positive development is the reduction and reconfiguration of the Riverside East Solar Energy Zone by approximately 43,000 acres. What that's done

is it's pushed the boundary of the SEZ away from sensitive lands in Joshua Tree National Park's eastern boundary and will ultimately help reduce the impact on national park resources.

Additionally, through visual mitigation mentioned in the Solar PEIS Supplement, the technologies limit their size and contrast, and will also help protect Joshua Tree National Park's visual resources.

An additional positive aspect of this particular document is the designation of 11,000 acres of a non-development area within the Riverside East Solar Energy Zone of intermittent lakes, major washes, and other sensitive areas. This will help protect plant and animal species.

The surveys mentioned in the Solar PEIS Supplement will help to identify and map desert dry wash woodland, ironwood forests, riparian habitat, sand dunes, sensitive plants, wildlife corridors, and all that's a really great start. But it's not enough. From there, the process should be open to protecting additional land within the Riverside East SEZ if the surveys indicate sensitive plants, animals, and habitat.

One other positive development I'd like to applaud is the exclusion of all proposed California

Desert Protection Act of 2011 lands from consideration. This protects park additions for all three California desert parks over 70,000 acres. And it really makes the case that these lands are recognized for their nationally significant values and supports their case for park addition.

One criticism of this particular document is the preferred alternative. The preferred alternative for the Solar PEIS Supplemental focuses renewable energy development in solar energy zones, but it also establishes variance processes which would open up an additional 20 million acres to solar development.

The problem with that is that the variance process is really incongruous with the establishment and idea behind solar energy zones.

There's been considerable time, effort, and energy placed into identifying, reconfiguring, and identifying low-conflict solar energy zone areas, and solar energy zones should really be the place for solar energy development.

So development in the solar energy zones exclusively protects other important resources that I'm sure the BLM wants to protect, such as wildlife, scenic viewsheds, water resources, air quality, and, of course, recreational opportunities.

So I thank you tonight on behalf of the National Parks Conservation Association for being able to make these comments. Thank you very much.

MS. HARTMANN: So we've got Brendan Hughes, and after Brendan will be Adam Eventov.

MR. HUGHES: Hi. Name is Brendan Hughes. I kind of have a scattershot of comments, so hopefully they are not too all over the place.

But I just wanted to say a few things about the program PEIS, the Supplement. Earlier it was said that you were going to -- you want to have a process for establishing new zones, zones with low resource conflict, and I was just wondering, what does that constitute exactly?

I think there needs to be a lot of thought put into what is low resource conflict because Ivanpah I always thought of as low resource conflict, and it's been sort of disastrous in terms of the desert tortoise. That project threatens the viability of a whole unit of desert tortoise population.

So if we're going to have more disasters like that, then I think we should think long and hard about low resource conflict zones.

The variance process is -- I'm totally

opposed to it, and I think most desert dwellers are. I'm from Joshua Tree, and although a lot of those variance zones won't necessarily be right in my town, they will be in areas that I deem to be very important for recreation, for habitat, for desert dwellers, and people who live in cities who come out to the desert to have a good time.

Also, I think you need to take a hard look at the economic viability. You say, well, we have looked into the future to see what's going to be viable, how many more acres we will need in the future.

And, well, are a lot of these projects even going to be viable in the future? I mean, you're giving billions of dollars in loans to these projects that wouldn't really happen otherwise. So are these projects even going to be viable without those huge government subsidies?

Also, in terms of technology, I mean, three of your fast-track projects have switched to photovoltaic from the highly touted sterling solar engine, which is, you know, is going bankrupt. And I guess somebody bought them, but, I mean, are they actually going to use that, you know? The government spent a lot of money in terms of research on that.

So we're going to photovoltaic, but is that a

wise use of our public lands, when we can do the same things on our rooftops and brownfield sites or whatever. But rooftop is really the way to go, and I think that is something to be considered in terms of weight of the use of public lands.

And, really, you know, while we have 285,000 acres slated for the solar energy zones, and that's, what is it, about one megawatt per 10 acres, so that's 28,500 megawatts, that's three times what was the goal of the Energy Policy Act of 2005, and that's kind of dated at this point.

So we really need another Energy Policy Act to guide, well, what are our goals in terms of renewable energy, and what -- how do we want to get there? Do we just want to get there through destroying public lands, or can we get there through different avenues?

And I think -- I don't know if you can recommend that in a supplemental EIS, but I think that would be a good recommendation to put through because it seems like you -- maybe it's because of policies put forth by those higher, but you all are just kind of stumbling through this process, and you're still stumbling through it, especially with these variance zones, and you really need a concrete goal to guide

you. So if I were you, I would ask for that.

I think that's all I have to say. So thank you.

(Applause.)

MS. HARTMANN: Okay. And Adam Eventov. After that, we will have Pat Flanagan. Is Pat here?

MS. FLANAGAN: I'm here.

MR. EVENTOV: Hello. My name is Adam Eventov. I'm representing BrightSource Energy, pinch-hitting for Arthur Haubenstock who could not be here tonight.

On behalf of BrightSource, we appreciate the work that the BLM and the Department of Energy have done for the Solar PEIS.

We also appreciate all of the work that the Department of the Interior has done to support renewable energy and achieve the administration's goal.

We believe that renewable energy zones can be very helpful and can expedite permitting and transmission. However, it is also important to allow flexibility for development in appropriate areas outside of these zones.

Suitable lands should not be placed off limits to development and exclusions should be strictly limited to those necessary to protect critically

sensitive resources.

We are confident that the final Solar PEIS will provide a robust solar program that will promote the environmentally responsible development the nation needs to meet its renewable energy and climate goals and to protect our precious sources.

MS. HARTMANN: And is Rick Brodie here? You will be next.

MS. FLANAGAN: Good evening. My name is Pat Flanagan. I represent the Morongo Basin Conservation Association. It's an organization that for 47 years has been a community-based, non-profit, incorporated as a 501C4, dedicated to preserving the economic and environmental welfare of the Morongo Basin.

And I will limit my comments specifically to looking at the California map that's available on the wall back there and the wallpaper across it of pink and blue variance zones, and I look that these zones surround the marine base, they surround one of two edges the natural park, they surround field and wilderness areas, and I believe that in this surrounding, and what I hear this evening, consideration is not being given to communities of which – are within the Morongo Basin.

You have 70,000 people who live there and who

have a concern economically for themselves as gateway communities, and to have that kind of blue and pink on our boundaries does not in any way reflect the general plans of the communities.

I also would like to say that I wonder where the Department of Defense is in this. Billions of dollars have been spent by the Department of Defense, the Department of Interior, California Fish and Game, private money, non-profit organization money, to protect lands that have been well-studied in terms of their wildlife corridor and linkage, and this is not reflected there.

There are two studies that -- one of which is -- actually, both of which are general and some within the general, it is backed up by something more specific.

You can look at South Coast Wildlands, also called now SC Wildlands. They are currently undergoing the work for the California Desert Conductivity Linkage Planning areas. But in the past, they also have -- let me make sure I get the name right -- the California Central Habitat Connectivity Project, which also includes the Morongo Basin, which is perhaps the best study.

It is the best study because there's a real concern by the Department of Defense that the 29 Palms

Marine Base, which is the largest Marine base in the world, and which is a live fire training base, so that everybody who goes to Afghanistan and passed to Iraq would go through there, and they have concerns, I know, that there would be solar energy around their base, and I don't believe that -- I'm speaking for what -- I'm not speaking for the Department of Defense, but I'm wondering why they are surrounded by variance lands. I think that's what I should call them.

The national park, Joshua Tree National Park, there are a number of studies that are done for especially desert tortoise and Joshua trees, but desert tortoise particularly, that look at the populations that will be moving with climate change, and this is not allowing for those populations to move. And, in some respects, particularly the ones down in Desert Center, it is very possibly going to destroy those populations, so there won't be anything there to move.

So between the linkage problem, between supporting communities who have a tourism base, and -- I would ask you to please look at those more carefully. Thank you.

(Applause.)

MS. BRODIE: Hello. My name is Rickie Brodie. I'm here just speaking as a citizen of Palm

Desert.

So, ladies and gentleman, we residents of Riverside County are proud of all we have done to make the solar industry welcome here. The solar industry gives us a big edge in terms of Riverside County being seen as a progressive, future-looking county.

The Riverside County Board of Supervisors has approved a comprehensive solar power plan policy requiring large-scale solar developers to pay $450 per acre to compensate the county for use of the property and for committing immense tracts of land exclusively to solar development, more than 25 suggested power plants for the county, covering approximately 118,000 acres in Eastern Riverside County.

The projects are expected to deeply change the look of the desert, eliminating all of its other potential uses. A great many acres of land are needed to help the society transition from fossil fuels to renewal fuels.

We residents of Riverside County have done as much as possible to enable the solar industry to begin work here as soon as possible. The Board of Supervisors is even giving a 10 percent reduction in fees for projects begun before December 2014.

But Riverside County has responsibilities to others besides the solar industry. We also have responsibilities to residents and to those who live in this country because they love the desert.

There are side effects to our commitment to solar power. Desert landscape will be scarred forever. Wildlife habitat will be destroyed.

It is apparent to me that Riverside County has given its all to the solar industry. The acreages going to the industry are extremely generous. However, BLM has left a door open for further land use for solar because of the variance process.

Due to wildlife and resource conflicts, all areas left in the BLM zone should be deemed unsuitable for development.

Riverside County still deserves and needs unspoiled desert, and the citizens of our county cannot lose any more of our precious legacy. We have done more than our share to establish solar power in the desert. Now our wildlife and desert habitat must be protected. Thank you.

(Applause.)

MS. HARTMANN: Thank you, Rickie.

We have John Stewart. And after John -- is April Sall here?

MR. STEWART: Good evening. John Stewart, resource consultant for the California Association of Four Wheel Drive Clubs.

In looking at the Solar PEIS, you look at the objectives, and one of the objectives talks to minimize potential negative environmental, social, and economic impacts.

Whether you're looking at the Supplemental or the original Solar PEIS, you have to ask the question, "How can you minimize the potential negative impacts when the true environmental, social, and economic issues are not fully described, let alone defined?"

So there still needs to be a lot of work in the area of how that is going to be accomplished, how you're going to look at what the economic impacts and the social impacts are, as they are not defined. Your impacts to recreation are not defined because you don't talk to recreational impacts.

Another objective is you facilitate near-term utility-scale solar energy development on public lands. Well, near-term. Let's just look at near-term.

As these projects are expected to be around for 20 or more years, that's basically a generation. Why enter into something in such a quick fashion without doing a thorough economic and a thorough

environmental and a thorough social study on the impacts.

Now, again, there is no defined rehabilitation or restoration when these developments are expected to come to an end. That is, once a project is completed, what happens? They just walk away? There's nothing defined about this. Because in the construction development, they will be recontouring the land. How about returning it to its natural state?

Then, lastly, looking at something that has -- that is completely missing within the studies is the geographic locations.

When you start looking at a close review of the maps, many of these solar zones are located in alluvial plains. These alluvial plains are landforms that are flood zones.

So, and, again, where you start recontouring the lands, now you are changing the water flow patterns, or the potential.

So additional impacts need to be closely looked at for wherever these projects are going to be sited, whether these be in the approved zones or in any of the variance zones.

Then, lastly, looking at the concepts of the geographic landforms, throughout Southern California,

there are many seismically active zones. Seismic activity and the effects of potential earthquake faults that fall along the lines of some of these zones have not been identified.

So, again, there is still a lot lacking in the Supplemental that needs to be studied, needs to be looked at. Thank you.

MS. HARTMANN: And after April, we will have Ruth Nolan.

MS. SALL: Good evening. April Sall, Conservation Director for the Wildlands Conservancy.

My grandmother homesteaded in a very remote, water-blessed canyon in the desert near Pioneer Town, California. That canyon is now part of a preserve, which is owned and managed by the Wildlands Conservancy, which I am the current manager of. TWC is a 5133 non-profit that was formed to protect wildlands and to do free outdoor education for children.

It is an honor to live in and manage this canyon as a third-generation resident of my family, and just a year and a half after taking that position, it was severely burned in a wildfire. About 95 percent of the preserve was burned, and this fragile desert landscape was changed overnight. I experienced

firsthand how a drastic event can impact these extremely fragile desert lands literally overnight.

Shortly after that fire, I learned and organized opposition around the Los Angeles Department of Water and Power's Palomar Transmission Project. Since that time, I have spent a majority of my time, both personally and on the job, working on renewable energy issues and fighting to protect lands that we have already saved and conserved.

Beginning in 1999, Wildlands Conservancy began an acquisition project known as the Catellus Land Purchase. We purchased over 630,000 acres of Mojave Desert, checkerboarded land, with private money, and donated it to the federal government and our public land system.

This was the largest land acquisition gift to the American public in U.S. history. We thought our work was done in conserving the great landscape in the Mojave Desert, until the 2005 Energy Policy Act opened up these lands for renewable energy development.

While we support the move towards renewable resources and renewable energy in this country, we would like to honor our public lands system and begin with a no-regrets policy that focuses on already disturbed land.

We support the removal of the Iron Mountain, a remote area in the core of the Mojave Desert, but we do not support the alternative, the modified renewable solar energy program alternative with the variance lands.

These variance lands are the connective tissue between our wilderness and national park system units. They connect the Mojave Desert for wildlife and ecological corridors, for public recreation, and include cultural sites and irreplaceable resources.

We support the zones-only alternative with the opportunity to develop an additional SEZ in the West Mojave or utilize the Desert Renewable Energy Conservation Plan to reach that opportunity.

The flawed assumptions in the Supplemental, such as the fact that 75 percent of the development will occur on public land, is still very frustrating.

Conservation groups, such as the Wildlands Conservancy, have identified over 200,000 acres of previously disturbed land close to existing transmission corridors with willing sellers. It is appropriate for renewable energy development and below 5 percent slope. These lands are also closer to their point of views and the increased energy efficiency.

Furthermore, with the change in technology

and the switch towards most projects utilizing photovoltaic technology, these projects can be scalable and utilize checkerboard land and smaller parcels of land, such as those found in the West Mojave.

The UC research scientists described the Mojave Desert as one of the last most intact ecosystems in the world. It is irresponsible and unnecessary to prematurely destroy these lands, these intact desert lands, while several other alternatives exist, including utilizing previously disturbed lands.

We support a no-regrets policy that prioritizes disturbed lands because there will be no Superfund that can fix this mess or restore these fragile desert lands.

It is time to learn from the hasty decisions and mistakes of the past in land management and honor and protect and conserve our public land for current and future generations.

(Applause.)

MS. NOLAN: Hi. My name is Ruth Nolan. I'm a professor of English and California Desert Literature at College of the Desert here in Palm Desert.

I'm also a former employee of the BLM. I worked for several years for the California Desert District as a seasonal firefighter, and I'm a native of

the Mojave Desert like April.

I would like to thank everybody for the opportunity to speak, and I'm just going to register my serious concerns about the government's renewable energy policy and the designation of California wildland, public lands, and other western and southwestern lands. We may be talking about just one site here, but this is part of -- this is just the tip of the iceberg.

And I have a student from Holland this semester, and he is just really baffled, and his question was, "In Europe, we have rooftop solar. So why is your government going to destroy the desert to do the solar?" And it's just very confusing to him because in Europe, as for many people here, the desert is a national treasure.

And, as April said, it's one of our last large and intact ecosystems, not only full of special animals and plants and ecosystems, but cultural and historical resources, that are not just facts of the past but areas that are still being used by not only recreationalists but Native American people in the entire desert.

I have walked this land. This is my home. All these places where solar and wind are being

proposed, I know what's out there, and I have combined my life's time spent in the desert in an anthology I did for Heyday Books called "No Place for Puritans, The Literature of California's Deserts," which I use as an education resource for my students and in lectures and talks and workshops I give throughout the country on the California Desert.

And one of my concerns here is that so much of what's celebrated in the book, things that describe this area as a living, breathing landscape, where culture and history and environment flow as one, more than anywhere else left in our country, is that I will be forced to tell my students that "If you want to see a desert tortoise, you're going to have to look at a picture in a book."

If I tell my future grandchildren to go out and see something in the desert, they are going to be confronted with a fenced-off wasteland.

I do not know why our government -- that we should know better, we are at a time in our world's history when we all know better than to raze an ecosystem and call that being renewable and being responsible. It just doesn't work like that.

And for those of us who do know what's out here, this is, like, really appalling. Anyone who grew

up in the desert, even though it's not my generation, remembers Chinatown, the landgrab done by Los Angeles in the northern Mojave in the Owens Valley. That's a well-kept secret at the time, and I see this renewable landgrab of the desert southwest as our 21st Century version of Chinatown.

Because the majority of -- I don't see this considered in the PEIS in the revised version, who is benefiting from this? Where is the energy being shipped? And I just can't see this as anything else except a landgrab. A landgrab that's going to make a handful of people really wealthy and at the expense of the taxpayers.

As many of my students are really surprised to find out, these stimulus funds come from our money. So anyone who has a job is paying for this, and there's already been a lot of reckless usage of millions and millions of dollars in funds.

So I do feel that our government failed us by pimping out our precious land and then trying to tell us it's for our own good. Because the idea to ruin something in order to save something is a complete oxymoron and doesn't translate into something realistic.

I also do have some concerns about the usage

of water. Water is a precious commodity in the West, and I want to know if there's anything that addresses the amount of water required for these particular solar projects.

What about health concerns? I myself have been suffering from Valley Fever, which is an airborne -- I'm an English teacher, so I don't know the scientific name for the airborne fungus, but I contracted this some years ago when a pristine desert area next door to where I live was plowed up for development.

This is a rising health concern in the Southwest, and I'm very concerned. We see a lot of dirt and wind, blowing sand here when the wind blows, and the wind blows in the desert many, many days of the year.

So these are among concerns I would like to see addressed, along with other environmental hazards, pollution. Do we see toxic by-products seeping into our water, the Colorado River Aquifer?

So, anyway, I would also just like to ask our government to reconsider its Federal Renewable Energy Policy Plan because it seems to be something that is not going to be healthy for anybody or anything in the long run.

Thank you very much, and I appreciate the chance to speak.

(Applause.)

MS. HARTMANN: Thank you, Ruth.

Pat Flanagan?

(Inaudible.)

So then Victoria Fuller.

I'm sorry. I've got people twice.

Oh, here it is. Mr. or Mrs. Fleck? Afterwards it will be Carl Zichella.

MS. FLECK: Good evening. Just listening to the comments --

MS. HARTMANN: Tell us your name.

MS. FLECK: Oh, I'm sorry. Almut Fleck, A-l-m-u-t, F, like in Frank, l-e-c-k.

I carefully listened to all the comments, and it is obvious that so much more thought has to go into it and research in the transmission lines themselves, and this has not been addressed.

There are studies that show that there are effects on the people living in the vicinity of them, and I would like to see more of that addressed.

We heard about all the different negative effects of this project, and I just want to say, do not fast track this project.

Thank you very much.

MR. ZICHELLA: Carl Zichella, Director of Western Transmission for the Natural Resources Defense Council (NRDC). I'm here representing our membership. We have 250,000 members who support us here in California.

NRDC has been deeply involved in both land conservation and energy efficiency, energy conservation, distributing, generation, and large-scale energy issues for quite some time.

We believe that to respond efficiently and effectively to climate change, we're going to need renewable energy development at all scales. We need to do as much as we can with energy efficiency, distributing, and generation, but we also are going to need some large-scale, utility-scale generation as well.

And the key to doing that right is making sure it gets placed in the right places. Getting those areas identified and developed in a timely way is critically important for climate radiation.

Every particle of what we put into the atmosphere today is with us for a century, and to the extent that we can make this transition that others have spoken about to a more renewable future, we need to do that quickly. Time is of the essence.

Changes that are already being observed from desert ecosystems are going to be accelerating. It's not an excuse to do things in a haphazard way. And, in fact, we have, NRDC has struggled with and feels that BLM's effort to move away from a simple project-by-project approach is a big improvement over where we've been for the last, I'd say, four or five years.

We have made enormous efforts to try to work with project developers and transmission sponsors to reduce the impact of these kinds of developments for the existing developments, but also, perhaps more importantly, to come up with a program moving forward that focuses on appropriate zones for development.

NRDC believes we need to look for the best available sites, regardless of ownership, and it shouldn't be focused on a public lands only process. In fact, as many have said, there are other good sites off the public lands, too.

We do commend the department for recognizing the short-comings of the existing approach and for looking for a different, better way. Specifically, we commend you for reaffirming in the Supplemental Draft EIS your commitment to zone-based development.

Guiding solar development to appropriate places is a way to ensure that the benefits of solar

energy are realized, while the unique and sensitive resources of public lands are protected.

While the department clearly listened to many public comments it received, and there is remarkable changes from the draft -- and thank you for that -- our analysis reveals that it wasn't particularly well through consensus comments submitted by a group of other environmental organizations, utilities, and solar developers that NRDC helped pull together.

That was a hard-won consensus, and we are pleased to see that much of it's reflected in the revised plan represented in the Supplement.

For example, we recommended that the department and the department is proposing a clear process for designating new zones, along with clear criteria for use in that process.

Also, appropriate areas for development identified through processes, such as the Desert Renewable Energy Conservation Plan, the West Chocolate Mountain EIS will be designated zones.

Incentives will be provided for projects located in designated zones and -- excuse me -- as well as for transmission in designated zones and to those zones.

And the department has recognized the need to

provide flexibility for well-sited projects outside zones with the new variance projects.

These and other new program components, once adopted, will reduce project costs, shorten time frames, and provide greater certainty for all stakeholders, including conservationists and the solar industry, that solar development will move forward on our public lands.

We look forward to working with the department, our colleagues in the conservation community, and members of the solar industry to finalize a comprehensive and sound final framework for solar energy on public lands as quickly and as positively as possible.

And I think the department has done a good job, has been very attentive to the public comment, and we look forward to getting this process to move forward so we can get the appropriate developments in the right place. Thank you.

MS. HARTMANN: Okay. Thank you, Carl.

I have two more people signed up to speak. V. John White, and then after that, Pam Eaton. And then after you two have spoken, we will see if anyone who wasn't signed up wants to speak.

MR. WHITE: Good evening. My name is V. John

White. I'm the director of the Center of Energy Efficiency and Renewable Technologies, which is based in Sacramento. We are a coalition of clean energy advocates --

THE REPORTER: I'm sorry. I can't hear you. Can you speak up?

MR. WHITE: We are a coalition of clean energy developers and clean energy advocates, including both companies that develop solar, wind, geothermal, as well as environmental groups that work on climate and backing out coal.

We've been active on this process, and I don't know want to talk too long because there's a lot of important comments you've already heard.

(Inaudible.)

MR. WHITE: Excuse me?

MS. HARTMANN: I think if you just, if you pull it closer to you.

MR. WHITE: There's a couple of issues I wanted to highlight that I don't think others have raised. One is I think there's severe problems with the competitive leasing proposal that you have included in this. I think this is really not the place. This is about trying to get the land use and the permitting design for solar rights.

This is a very different industry than extractive industries. You're renting the land. You're not extracting resources from the land. And presumably there will be obligations to restore the land.

Also, a gross revenue is not the right way to approach something like this. It's much more akin to a lease or a rental. And I think if there's going to be revenues raised in this fashion, it needs to be examined for the potential to also be sent back to local government.

Issues we have here in Riverside are the public benefit of the development, and on the federal lands there needs to revenue sharing. But also we need to be very careful how we go about putting this kind of new leasing in place. We are also trying to change the way we plan and build the resource.

Secondly, we generally support the movement towards zones, but those zones have to be adequate and have to include areas that have the best value as well as the land being protected for conservation.

One of the failures that the BLM has not yet reconciled is that, when it did the West Mojave Plan, there was no consideration whatsoever of the solar energy resource in the West Mojave.

Everybody else was at the table, but this was during a period when we had fallen asleep and gotten involved with deregulation and building more fossil fuel plants, and we forgot about the renewable energy potential in the West Mojave.

We accommodated mining, we accommodated outdoor vehicles, we accommodated wilderness, we accommodated military, but we didn't look at solar at all, and yet West Mojave, the land is largely undisturbed. A lot of it is marginal agricultural. A lot of the habitat is marginal. There's military lands there that have weapons on them. There's trash. It's not pristine in the same way that other areas of the desert are.

The other thing about the West Mojave is this land has the very, very best radiation of anywhere in North America, and it's 10 percent better than even in the East Mojave, which means that if you build a solar thermal plant -- which is the technology we think still has promise.

The world is going towards PV because the Chinese have flooded the market with cheap panels. But the value for the future may well rest with other technologies that currently are more expensive, like solar panels that use the land much more efficiently,

that produce much more energy per acre, a much more higher quality than PV, and it is very dependent on the high radiation.

And we have done some mapping and made some suggested improvements to the Desert Renewable Energy Conservation Plan, but the big failure is that this Supplemental did not add any land on the BLM area of the West Mojave into the mix, even to study.

We know that there is Mojave ground squirrel land up there that needs to be evaluated, but the Mojave ground squirrel is not the only interest that should be considered in developing a resource of this importance.

So we urge you to reconsider the exclusion of the public land in the West Mojave. We think that that land has better radiation, better transmission, fewer conservation values, compared to other places, and while we make more areas off limits to protect for conservation and to identify things that people are concerned about, we need to also take some time to evaluate areas, new areas that should be added that have high resource potential and are medium- or low-conflict land, for overriding considerations would argue for them to be included.

So we would urge that action to occur, and we

wish you well in your deliberations. You have a lot of things to consider, a lot of important public comments here tonight and elsewhere, and we thank you for your attention.

MS. EATON: Hi. I'm Pam Eaton, with the Wilderness Society, and I'm based in Denver, Colorado. And I wanted to just speak briefly because a lot of the things that I wanted to say have already been said.

But I will say that the Wilderness Society has a 75-year history of working on the protection of public land, and we are deeply engaged in trying to find solutions to the challenge of addressing the challenge of climate change, reducing gas emissions, and moving forward with renewable energy and looking at a variety of solutions that are needed: Energy efficiency, conservation, DG, and -- or distributed generation. I spend too much time with people who just use acronyms a lot of times, so I apologize if I use a lot of them today.

But part of the solution, and especially trying to move forward quickly and getting at this problem in a way that really is going to fundamentally address this, is going to be large scale. And so we appreciate the opportunity to work with the BLM and the DOE and others in trying to find solutions that really

guide that development to the appropriate places.

On the public lands, I think that really should be a zone-based process. I think the Supplement moves in the right direction, really looking for those low-conflict areas that can allow renewable energy to move forward but in a way that minimizes its impact on our other values of our public lands.

The Supplement, as others have said, addresses a lot of recommendations. We're going to make many detailed comments, as you know, in writing, as we have throughout this process.

So I just wanted to identify a couple of things that, you know, we think that there are real benefits of moving away from the project-by-project, identifying the zones, moving forward, being able to move projects more quickly in the right places, and to think about transmission to the right places.

We do believe that there's an opportunity to grow the lands that are available in an appropriate way in California. We absolutely think BLM needs to commit significant resources to working through the RECP, you know, the Renewable Energy Conservation Plan, to find those additional areas and to really find the places that are most appropriate to do that in the context of thinking about mitigation and conservation in the

desert.

And then finally, I guess I would just identify that there are additional improvements that need to be made. There are additional areas that should be excluded from consideration, including across the West, areas that have high-value wilderness, conservation. Citizens Proposed Wilderness Areas and others.

And then in the way that you move forward with implementing this decision, we think it is really important that these be embodied in the resource management plans and not just in policy that's guidance. And we realize you have committed to that, and we think that's really critical.

So thank you for the opportunity. Thank you for the work and the consideration that you've given to comments. And this is an ongoing process, and it will continue to improve, I think, between now and the final, and we are looking forward to seeing some of those elements that you talked about that we still haven't seen the outcome of yet.

So there's still a lot of work to be done, but looking forward to getting it done quickly and getting this new program up and running. Thank you.

MS. HARTMANN: Is there anyone else who

wasn't signed up?

MR. SHTEIR: I've signed up, but I'd like the opportunity to speak again, briefly.

MS. HARTMANN: That will be fine. I'm just going to make sure that there's no one that hasn't spoken yet that wants to speak. Is there anyone else?

Okay. Seth. Is that correct?

MR. SHTEIR: Seth Shteir, National Parks Conservation Association.

I'd like to echo what I've heard tonight about the variance lands being the connective tissue of the California Desert. And really, that connective tissue is not only ecological, it's not only historical, it's not only cultural, but it is also economic.

In truth, tourism is the lifeblood of a lot of our desert economy, and our natural parks and wildlands, they are powerful economic engines.

Utility-scale solar development, while having some benefits, also has the potential to disrupt wildlife, air quality, water resources, dark night skies, and recreation. And it is important that we consider the economic value of our wildlands and natural parks as this process moves forward.

Let me just cite some statistics from a very

important study by Michigan State University that really looks at the economic value of Joshua Tree National Park.

So in 2010, there were 1.4 million visits to Joshua Tree National Park and 287,000 overnight stays. Those visitors spent $58.8 million within 30 miles of Joshua Tree National Park. Those are in our gateway communities. And they supported 732 jobs.

So as this process moves forward, it is important that the ecological value of our wildlands is considered and national parks, it's important cultural resources are considered, it's important history is considered, but it's also important to consider the economic value of national parks and wildlands and to do our best to protect them. Thank you.

(Applause.)

MR. SMITH: I'm Paul Smith from the 29 Palms Inn in 29 Palms, California, and I'd like to just address several issues, some of which have been touched on, one which has not.

I enjoy writing about history, as Ruth Nolan does, and one of the things that's not been properly emphasized in the planning that's been going on for the siting and implementation of these has been preservation and protection of Native American cultural

sites. And I would strongly urge that that be given a renewed, really hard look.

There are people who have difficulty even affording coming here to a meeting like this who are seriously adversely spiritually affected by what's going on.

The second thing I'd like to comment on is to reinforce Seth Shteir's comments on the economic effects of what happens when our desert landscape is disturbed.

We have a real small inn. We have 23 rooms, a restaurant. We are located right at the outpost, or the outskirts of Joshua Tree National Park.

We have visitors who come to the 29 Palms Inn from all over the world, it's well-known throughout the world, and the surveys show -- the survey just recently done within the last year by the University of Idaho -- that the primary reason why people visit Joshua Tree National Park is it's wide-open, beautiful vistas, and we have to be aware that these sites can adversely impact those vistas. They already are doing so down in the southeastern corner of the national park, and these are important values.

Our little inn, our tiny little inn, contributes between two and a half and $3 million in

revenue just in our local area, and probably close to $4 million to four and a half million dollars in revenues in the larger metropolitan areas extending into Los Angeles where we buy a lot of food products and that sort of thing.

While in the great scheme of things, and the need for alternative energy, which we totally back, in the great scheme of things, that may not seem like a lot of money. To small communities out in the desert, this ability to maintain that tourism is very important and very valuable.

And the larger thing would relate to what Seth Shteir said that our national parks and the wilderness areas contribute a great value to what we do.

One of the most important things that was said tonight, which I think has been echoed by the Environmental Protection Agency comments, the wildlands conservancy commented that they have identified 200,000 acres. That's most -- that's a significant portion of what's been described as a needed area, which is already located on degraded land.

Degraded land, of course, wouldn't affect our tourism culture, our tourism commerce. It probably would even have a positive effect in terms of its

effect on wildlife. It wouldn't permanently destroy the desert soils, the cryptobiotic soils, which, once they are disturbed, they don't get restored.

For those of you who are in Washington, a wonderful, exciting trip you could have would be to go out into the desert here and see what the Patton training forces did to the desert soils fighting a major, important war.

Those soils are still disturbed and have not recovered. You can still see, what is it, 70 years later, you can still see the tire tracks and the metal track signs where they would turn their tanks.

So that the fragility of the desert should be borne in mind, and that's a desert that transcends just California. 90 percent of the biota in the desert is below the desert soil, or below the surface of the desert. So a lot of it that you think is a relatively dry environment, without a lot of things growing, is actually a very rich, biological environment.

So thank you. I'd like to encourage you to think about these things, particularly what wasn't stated tonight about the cultural heritage of the desert. Thank you.

MS. HARTMANN: Is there anyone else who would like to speak?

We will be here for a little while if anyone wants to talk or ask questions.

The transcript from today's meeting will be on the website in a few weeks, as well as the materials, if you couldn't see from the back.

All right. Well, thank you all for coming.

CERTIFICATE OF NOTARY PUBLIC

I, BEVERLY NEWMAN, the officer before whom the foregoing meeting was taken, does hereby certify that the statements made during the meeting were taken by me in machine shorthand and audio recording and thereafter reduced to typewriting under my direction; that said transcript is a true record of the proceedings taken by me; that I am neither counsel for, related to, nor employed by any of the parties to the action for which this transcript was made; and, further, that I am not a relative or employee of any party involved in the action for which this transcript was made, nor am I financially or otherwise interested in the outcome of this action.

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