

# MBCA



## morongo basin conservation association

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September 3, 2016

Jennifer Whyte, Project Manager  
BLM South Coast Field Office  
Palm Springs, CA 92262

Sent by email to [jwhyte@blm.gov](mailto:jwhyte@blm.gov)

Reference: Palen Solar PV Project

Dear Ms. Whyte:

This letter responds to the preparation of a Supplemental DEIS for the proposed Palen PV Solar Project. This will be the second supplemental EIS for a 6 square mile solar project on this site. This project is within the Chuckwalla sand transport corridor. PWA studied this sand transport corridor for two earlier projects: the Colorado River Substation (2010, revised 2011) and the Palen Solar Power Project (2010). These two assessments focus on sand transport as it relates to biological resources particularly the habitat for the Mojave Fringe-toed Lizard. The author particularly noted that these assessments did not study dust transport.

Air quality monitoring and regulations in the Mojave Desert Air Basin (MDAB) are provided by the Mojave Desert Air Quality Management District (MDAQMD). This project is in the eastern portion of the MDAB, in Riverside County. The entire air basin is currently designated as nonattainment for both the State 24-hour and the annual average PM10 standards, with only the western portion of the Mojave Desert AQMD designated as nonattainment for the State annual average PM2.5 standard. **Please note, however, there are no monitoring stations east of Twentynine Palms to monitor fugitive dust or any other emission in the east Mojave Desert.** The exception is Blythe, which measures for Ozone

Times have changed. We have officially entered the Age of Utility Scale Solar Projects. When vegetation is removed from desert soils the root systems stabilizing sand and dust are gone resulting in the release of fugitive dust: PM10-2.5. This is true even for the smaller commercial scale solar facilities of 100 or so acres on stabilized sandsheets as in Lucerne Valley and Joshua Tree in San Bernardino County. Utility scale Solar projects, square miles in extent, are dust bowls in the making when wind speed exceeds 15 mph. The MDAQMD Rule 403 Fugitive Dust (Readopted 1977), Rule 403.2 Fugitive Dust Control for the Mojave Desert Planning Area (1996), and Dust Control Guidance Plan (2001) are being applied in a cookie cutter fashion for solar projects at all scales.

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Current fugitive dust mitigation controls are unreliable because they lack supporting project data. In 2014 First Solar required two variances from BLM for an additional 150 acre feet of water to satisfy dust control mitigation during construction of the Desert Sunlight project in Desert Center. This six square mile project was constructed on a desert pavement surface, a major producer of fugitive dust when the stabilizing rocks are removed. There were no nearby monitoring stations for fugitive dust analysis prior to the application process. After the fact, and because of the proximity to Joshua Tree National Park, First Solar was required to install monitoring stations at the cardinal points of the project

FACT:

**There are no PM 10-2.5 monitors located in the South Coast AQMD portion of the Mojave Desert Air Basin.** The South Coast district stations in Palm Springs and Indio are in the Colorado/Sonoran Desert and for many reasons including wind direction, speed, and soil substrate are unreliable surrogates for the missing monitoring stations along the Mojave Desert east trending Chuckwalla sand transport corridor.

FACT:

In the eastern Mojave Desert there is no baseline data on which to correctly evaluate fugitive dust emissions for proposed solar projects or correctly estimate the required quantities of water for effective mitigation through the construction phase and life of the project.

FACT:

Evaluate Change over Time. Sand transport corridors are complex and to adequately understand fugitive dust emissions over time there must be on site measurements using EPA certified Met One Automatic Weather Monitoring System including E-Bam for particulate PM10-2.5. On site weather stations should be a requirement with the application. (Think of the vital information gathered by Wind Measurement (MET) Towers for wind projects.) The PSA studies provided background on seasonal change in sand movement as well as the changes with El Nino and La Nina years. How do these long term climatic variations correlate with dust transport? We need to know this in order to adaptively manage this resource into the future.

**BLM should require Particulate Matter monitoring be completed as part of the analysis and determination of the “Affected Environment and Environmental Consequences” sections of the EIS for all future solar projects within the DRECP Development Focus Areas (DFA). The Palen PV Project is within a DRECP DFA.**

FACT:

Palen Solar Energy Generating System (PAEGS) Draft SEIS, July 2013, Pages 4.16-7 &8  
*There are approximately 18 solar projects proposed or under construction along the I-10 corridor, predominately between Desert Center and Blythe. Based on the currently available data for these various projects (information obtained from Plans of Development and other project documents), and assuming all projects move forward, these projects could be constructed in the same general timeframe as the PSEGS, or have the potential to overlap for at least a portion of the construction period. From following paragraph that time period is 34 months.*

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Fugitive dust is a problem for the health of the construction workers, the I-10 travelers, and residents of the Blythe region and east of the Colorado River. Fugitive dust also affects wildlife and agricultural production. The health and safety, wildlife, and economic impacts must be addressed. And cumulative impacts from Salton Sea PM10-2.5 and worse that may be forthcoming.

FACT:

From the BLM Press Release 11/10/15

**Interior Department, State of California Announce Innovative Strategy for Renewable Energy and Conservation on Public Lands in California Desert**

*The DRECP planning effort was also called out as an early "sign of progress" in Interior's strategy for advancing landscape-scale mitigation policies and practices. That strategy, released in April 2014, describes the key principles and actions necessary to shift from project-by-project management to consistent landscape-scale, **science-based management** of the lands and resources for which the Department is responsible. (My bold)*

To carry out science-based adaptive management it is critical to have accurate and reliable data. Currently the air quality monitoring data, based on data gathered in Palm Springs and Indio is neither accurate nor reliable.

We repeat: BLM should require Particulate Matter monitoring be completed as part of the analysis and determination of the "Affected Environment and Environmental Consequences" sections of the EIS for all future projects within the DRECP Development Focus Areas (DFA).

The Palen PV Project is within a DRECP DFA.

Thank you for your attention to these remarks.

Sincerely,



Pat Flanagan, MBCA Board Member

Board Members  
Sarah Kennington  
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Marina West  
Laraine Turk  
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