

September 13, 2021

Mr. Brandon Anderson
Bureau of Land Management
1201 Bird Center Drive
Palm Springs, CA 92262
BLM_CA_PS_OberonSolar@blm.gov

Mr. Logan Raub
Colorado River Basin Regional Water Quality Control Board
c/o Aspen Environmental Group
235 Montgomery Street, Suite 640
San Francisco, CA 94104-2920
logan.raub@waterboards.ca.gov

RE: Proposed Oberon (CACA- 58539) Solar Project
Comments for Environmental Assessment and Draft Environmental Impact Report
Environmental Assessment DOI-BLM-CA-D060-2020-0040-EA

Dear Mr. Anderson and Mr. Raub,

I am writing on behalf of Mojave Desert Land Trust (MDLT) to comment on the proposed Oberon solar project. Founded in 2006, MDLT is a nonprofit conservation organization headquartered in Joshua Tree, CA. MDLT acquires, restores, and protects biologically and culturally important lands throughout a 26-million-acre service area in the California Desert. To date, we have conserved over 100,000 acres of desert conservation lands, and we have conveyed over 54,000 acres to federal and state agencies. We also hold a long-term interest in areas that we manage and monitor. These include Palisades Ranch on the Mojave River, Desert Springs in the Western Mojave, and habitat linkages in the Morongo Basin.

The proposed Oberon Solar project would construct facilities on 2,700 acres of public lands near Desert Center in eastern Riverside County in the Riverside East renewable energy zone of the Desert Renewable Energy Conservation Plan (DRECP). The DRECP was developed with the goal of providing for renewable energy development while ensuring the protection of the deserts' natural resources and ecosystems. It was negotiated over many years by a range of interests including conservation groups, the renewable energy industry, local and state governments, tribes, and recreationalists.

The proposed project is intended to produce 500 MW of photovoltaic solar energy, enough to power 200,000 homes, helping to achieve the Biden Administration's goal of a carbon pollution-free power sector by 2035. While achieving climate goals is important, this must be done in a way that does not result in significant degradation of desert species, communities, and ecosystems. To ensure this, the project needs to ensure consistency with the Desert Renewable Energy Conservation Plan (DRECP) and its conservation elements, goals, and actions.

The project, as proposed, requests exemptions from provisions of the Plan, Conservation Management Actions (CMAs), which are essential to its integrity of the conservation elements of the Plan. These exceptions would result in a 600-acre encroachment into a microphyll woodland, a rare and important habitat while at the same time compromising a designated multi-species wildlife corridor which is essential to ecosystem function. This is not a "minor incursion" as defined by the DRECP. The loss of

connectivity would be in an area where existing renewable energy projects have already created an impediment to movement and one which will be further reduced by future developments. The proposed encroachment into the wildlife corridor must be viewed in this context. Coupled with past losses, and reasonably foreseeable future losses, it would have significant effects on the health of plant and animal populations due to reductions in gene flow and subsequent loss of genetic variation.

To mitigate for the proposed encroachments, the project proponents have suggested acquiring replacement or offset parcels elsewhere within the Chuckwalla Bench region. The loss of connectivity which would occur, cannot be compensated for or offset by preserving land elsewhere on the Chuckwalla Bench. It is not comparable and thus not adequate mitigation.

Moreover, such a program is not necessary. Conservation land acquisition goals are already being achieved on the Chuckwalla Bench by both MDLT and the Friends of the Desert Mountains. They each have active and successful acquisition programs in partnership with the BLM. For example, MDLT has 5,518 acres in combination that it owns, it has conveyed or is conveying to the BLM, or that are pending acquisitions.

In summary, while MDLT recognizes the threats and impacts of climate change and recognizes the importance of meeting renewable energy goals, this cannot, nor does it need to be done at the expense of our irreplaceable desert species and ecosystems, many of which are of national importance (see Appendix L of the DRECP). We ask that that the BLM not support or approve a project alternative that would make exceptions to the CMAs, but instead choose one which avoids the microphyll woodland and maintains the designated multi-species wildlife corridor. It is essential to the future health of the areas' ecosystems and to the future integrity of the DRECP that an alternative be approved which keeps the CMAs in place, and which maintains the resources they were designed to protect.

Sincerely,

A handwritten signature in black ink, appearing to read "Geary Hund", written in a cursive style.

Geary Hund
Executive Director
Mojave Desert Land Trust