



Friends of the
Desert Mountains

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September 13, 2021

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

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: Environmental Assessment (EA) and Draft Environmental Impact Report (DEIR) for the Proposed Oberon (CACA- 58539) Solar Project.

Dear Mr. Anderson and Mr. Raub,

The Oberon Solar project is proposed for construction on 2700 acres of public land in the Riverside East renewable energy zone designated by the Desert Renewable Energy Conservation Plan (DRECP). Friends of the Desert Mountains was a seated stakeholder in DRECP and supports its conservation protections, which were carefully negotiated over many years by a range of stakeholders—environmentalists, the renewable energy industry, local and state governments, recreationists, Tribes and more across nearly eleven million acres of BLM public lands in the California desert—to ensure solar projects can be built without destroying sensitive habitats, migration corridors, cultural sites, and climate values.

The other recent projects in this renewable energy zone have complied with DRECP's conservation protections. But Oberon wants an exception to the rules so they can expand onto 600 acres that would encroach on a sensitive microphyll woodland. Microphyll woodland is a rare habitat, and one of the richest biological resources in the desert, so the DRECP requires developers to avoid microphyll and maintain buffers to sustain this rich habitat. It is important for the EA to explain that there are another 148,000 acres in the same renewable energy zone for developers to choose from, and the vast majority of those acres have no microphyll woodlands.

Encroaching a square mile—over 600 acres--into rare microphyll woodland and buffers just to expand the area of solar panels does not qualify as a “minor incursion” that might be allowed under DRECP. Minor incursions as defined by DRECP were contemplated only for essential infrastructure such as roads and transmission lines which could not be sited elsewhere. In any event, destroying

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600 acres that was slated for preservation under DRECP is not a minor impact by any definition of the word minor.

Further, the notion that the acquisition of lands offsite in the Chuckwalla Bench somehow reduces this impact to a level of insignificance fails to recognize the unique value of the resources on the Oberon project site itself, a substantial portion of which is in a DRECP-designated multi-species wildlife connectivity corridor. The DRECP itself recognizes and protects those unique values, and they cannot simply be “replaced” or “offset” by buying land elsewhere in the Chuckwalla Bench. Friends of the Desert Mountains and others have acquired many thousands of acres in the Chuckwalla Bench and environs, and we will continue to do so. Those offsite resources are actively being preserved, so the suggestion that destroying sensitive habitat in one location is OK because it will allow for protection in another location is incorrect.

In sum, Friends requests that the EA and DEIR be revised to fully acknowledge and analyze the harm from the proposed project, and to only approve a project that fully avoids onsite microphyll woodlands and buffers, as required by the DRECP, while also maintaining a functioning multispecies corridor wide enough to accommodate threatened desert tortoise traversing the site.

Thank you for the opportunity to comment.

Sincerely,

Tammy Martin,
Executive Director

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