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Subject: Public Comment: Opposition to the Proposed Crescent Peak Renewables Industrial Wind Turbine Project

To: blm_nv_sndc_crescentpeak@blm.gov

From: Dr. Donald Allen Deever
P.O. Box 8
Searchlight, NV 89046
deeverd@unlv.nevada.edu
(702) 375-6929

To whom it may concern,

As a public commentator on this highly disturbing environmental issue, I willingly preface these submitted comments by stating that my personal information should be included in this document for public view. Moreover, it is necessary to state up front that I am strongly opposed to this misguided and destructive project and that I will not cease to play a lawful part in preventing one of the country's greatest ecological tragedies from occurring. Moreover, I share the objections of every like-minded individual and environmental organization who recognizes the priceless ecological, recreational, historical, cultural, and scenic value of the Wee Thump Joshua Tree and South McCullough wilderness areas, Castle Mountain National Monument, and Mojave National Preserve areas that will be drastically and irrevocably devastated if the proposed industrial wind turbine project by Crescent Peak Renewables is unlawfully allowed to take place in the form of hundreds of industrial wind turbine towers that will stand 400 to 700 feet high.

The subsections below concisely summarize the grounds for my opposition based on harm to biological resources, visual resources, cultural resources, tribal interests, recreational potentials, and human health. It should be noted that these objections stem from far more than personal opinion but represent scholarly

research consisting of more than 1,000 pages of online documents on the topic. It should also be noted that while each of the 50 numbered passages in this public comment submission represents an objection to the aforementioned industrial wind turbine project, these numerous objections do not represent the entirety of my objections, which grow with each day that I conduct further research into this highly disturbing plan.

I. Objections Based on the Potential Harms to Irreplaceable Biological Resources

VULNERABILITY OF A VERY SMALL WILDERNESS AREA

(1) The Wee Thump Joshua Tree Wilderness represents one of the smallest designated wilderness areas in the United States. To allow a pristine 6,050 acre wilderness area to be surrounded by 35,000 acres of 400 to 700 foot tall industrial wind turbines would be to destroy countless numbers of rare and endangered species in this untrammelled and pristine portion of Southern Nevada. Since the proposed Crescent Peak Renewables project is roughly six times the size of the adjacent wilderness, it will literally engulf what is now a crown jewel of Southern Nevada, making it no longer possible to treasure the untrammelled serenity of the wilderness.

AUDUBON IMPORTANT BIRDING AREA

(2) Wildlife does not recognize wilderness boundaries and therefore the areas adjacent to the Wee Thump Joshua Tree Wilderness (where the industrial wind turbines are designated to be erected) are just as important grounds for year-round and migratory wildlife as the designated wilderness areas themselves. In fact the Audubon Society has listed the expanse of lands to the east of the Wee Thump Joshua Tree Wilderness as being equally an IBA (Important Birding Areas), which the BLM completely acknowledged in its 114-page Wilderness Management Plan and Environmental Assessment for the South McCullough Wilderness and Wee Thump Joshua Tree Wilderness areas in 2005, *“The remote location, steep terrain, and perennial springs of the South McCullough Wilderness support a variety of wildlife including crucial summer habitat for solitude dependent species. The Wee Thump Joshua Tree Wilderness is made up of a relatively dense and continuous stand of Joshua tree woodland and supports a diverse assemblage of birds. The*

wilderness and surrounding Joshua tree woodland have been recognized as an Important Bird Area by the Audubon Society.”

Later, in that report, the BLM reiterates the same need for the protection of the IBA areas and does so in more detail, *“Primitive recreational opportunities are outstanding for walking through and viewing a dense Joshua tree stand and the birds that inhabit the area. The stand is unique in the number and size of specimens and provides cavities that attract birds for nesting or winter refuge. This cavity habitat is rare within the desert environment and consequently attracts a diversity of bird species. Bird watchers visit the area and the Audubon Society has recognized it as an ‘Important Bird Area.’”*

That the BLM has taken the IBA seriously was shown in their literature by the very fact that they acknowledge it. What the BLM doesn’t say, however, is that the wilderness area covers only about a third of the IBA. The rest of the IBA stands on those portions of ground where the proposed industrial wind turbine project is planning to take place. Here is how the Audubon Society describes the location of the area, *“The phrase ‘wee thump’ is of Paiute origin and means ancient ones, and in this case references the spectacular Joshua tree forest covering this site. The eastern boundary of the IBA lies about six miles west of Searchlight, and stretches to the eastern slope of the McCullough Mountains. The IBA takes in the densest stands of the Joshua forest. NV 164 crosses the IBA on the east-west axis, and a couple of two-track dirt roads also penetrate the area. About a third of the site was designated Wilderness in 2002.”*

Jose Witt of the Friends of Nevada Wilderness, put the importance of the lands adjacent to these wilderness areas in the following profound way, *“If we put this type of development in the middle of all these protected lands, it ruins the integrity and conservation values of all this area. We fragment the habitat and essentially lose islands of protection, or become islands, because there is no continuity.”*

RARE NESTING CAVITIES

(3) According to BLM literature, *“The large Joshua trees of the Wee Thump Joshua Tree Wilderness offer nest cavities that are rare throughout most of the low elevation Mojave Desert region. As a result, this wilderness supports a unique group of cavity nesting birds and birds using cavities for winter refuge. Birds recorded in the wilderness include ash-throated flycatchers (*Myiarchus cinerascens*), Bendire’s thrashers, Cassin’s kingbirds (*Tyrannus vociferans*), gilded flickers (*Colaptes chrysoides*), gray flycatchers (*Empidonax wrightii*), gray vireos*

(Vireo vicinior), hairy woodpeckers (Picoides villosus), Le Conte's thrashers (Toxostoma lecontei), loggerhead shrikes (Lanius ludovicianus), northern flickers (Colaptes auratus), phainopepla, Scott's oriole, western bluebird (Sialia mexicana), western burrowing owl, and white crowned sparrows (Zonotrichia leucophrys). Red-shafted flickers and other bird species in the higher elevations of the South McCullough Wilderness may also winter here. Additionally, prairie falcons have been documented flying in the area."

The fact is that the same ecological importance could and should be attributed to the Joshua tree forest lands that stand adjacent to the Wee Thump Joshua Tree Wilderness, upon which it is proposed that destructive industrial wind turbines be built. How adjacent will these industrial wind turbines be? According to the Nevada Independent, *"The proposed wind project rests between national monuments [Mojave National Preserve and the new Castle Mountains National Monument], ACECs, and wilderness areas. That's one reason that environmentalists are so concerned by its placement. In addition to wildlife impacts, building so many turbines — the smallest ones would be the height of a 41-foot building — could change the landscape."* According to the plan, 400 to 700 foot tall industrial wind turbine generators would be built on the northern New York Mountains, Castle Mountain hills, and McCullough Range (into the pinyon-juniper woodlands).

Even the BLM acknowledged in a two-page publication dedicated to promoting visitation to the Wee Thump Joshua Tree Wilderness, *"...what it may lack in size, it more than makes up for in stunning natural history."* So does the area around it, where there is also a proliferation of Joshua trees with nesting cavities that are known to be so vital to the well-being of the area's wildlife.

GILDED FLICKER

(4) The Wee Thump Joshua Tree Wilderness area is the ONLY place in the entire state of Nevada where the gilded flicker can be found nesting, and this special treasure is fully acknowledged in writing by BLM literature, *"The only known breeding population of Gilded Flicker in Nevada is located here."* To disturb the borders of the Wee Thump Joshua Tree Wilderness is to also disturb the interior of the wilderness, which means disturbing a one-of-a-kind avian species that breeds nowhere else in the state.

BAT POPULATIONS

(5) Industrial wind turbines of the horrific magnitude proposed by Crescent

Peak Renewables would drastically decimate the bat populations in this area and allow harmful insect populations to explode. There is a massive amount of peer-reviewed literature that has been published by scientists and other doctoral researchers at universities around the world that have reported on the drastic mortality rate of birds and bats that fall victim to industrial wind turbines. Some studies on the mortality of bats point out that certain populations of bats that are already declining in alarming numbers could become completely wiped out if industrial wind turbines were allowed to factor into the equation.

Other shocking studies have shown that 86% of the bats that fall victim to industrial wind turbines in some areas are either pregnant females or lactating mothers, which means that their demise also spells the demise for their young. Therefore, 86% of any mortality counts of bats that were killed by industrial wind turbines should at least be doubled since most bat mothers produce one offspring at a time, although twins are no more uncommon among bats than they are among humans.

Published research also exists to show that whatever number of deceased bats are found around industrial wind turbines, those numbers represent only a fraction of the total number of bats killed due to predators who eat the victims before official counts can take place. This same observation applies to any avian species that are decimated by industrial wind turbines.

There are no shortage of legitimate studies that point to the fact that industrial wind turbines create frequencies that interfere with the radar abilities of bats, causing them to become prey to industrial wind turbines. Those of us who strongly oppose this misguided industrial wind turbine project have collected ample peer-reviewed evidence along these lines.

Bats are a special feature of the lands within the wilderness areas and the lands adjacent to them. BLM literature acknowledges this truth, *“In addition to federally and state listed species, BLM manages sensitive species as if they are candidates for listing. They are provided the same level of protection as candidates to ensure that actions authorized, funded, or carried out do not contribute to the need for the species to become listed. Based on existing habitat characteristics and data collected in the Eldorado Range and southern Spring Mountains, the following sensitive bat species may occur within the South McCullough Wilderness: pallid bat (*Antrozous pallidus*), Townsend’s big-eared bat (*Corynorhinus townsendii*), Allen’s lappet-browed bat (*Idionycteris phyllotis*), Californian myotis (*Myotis californicus*), western small-footed myotis (*Myotis ciliolabrum*), little brown bat (*Myotis lucifugus*), fringed myotis (*Myotis thysanodes*), Yuma myotis (*Myotis yumanensis*), long-legged myotis (*Myotis**

volans), *western pipestrelle (Pipistrellus hesperus)*, and *Mexican free-tailed bat (Tadarida brasiliensis)*. *No known bat surveys have been conducted within the South McCullough or Wee Thump Joshua Tree Wilderness areas.*” It is significant to note that the proposed industrial wind turbine project is supported by the BLM despite the severe lack of studies accomplished on the local bat populations.

DANGEROUS INCREASE IN PREDATORS

(6) Since predators quickly learn the sources of regular food (victims of industrial wind turbines), this means that the populations of desert predators who live or migrate around industrial wind turbines in the proposed construction areas, between the South McCullough Wilderness and the New York and Castle Mountains, would unnaturally increase their population to the point that they could wipe out some of the species they most commonly prey upon.

DECIMATION OF HERBIVORE POPULATIONS

(7) To compound the increased predator problem, both of the designated desert wilderness areas and other protected lands that would be harmed by the industrial wind turbine project (including adjacent lands), are rich in herbivore species who rely on their hearing for survival, hearing that will be permanently compromised by the incessant noise of the turning blades on the industrial wind turbines.

FEDERAL, STATE, & COUNTY PROTECTED SPECIES

(8) While this project threatens large numbers of Federally protected species, it also threatens an equally large population of state and county protected species. According to BLM literature, *“Though not federally listed, several state protected species are found within both Wilderness areas. Suitable roosting and foraging habitat for the Spotted Bat (Euderma maculatum) occurs throughout the South McCullough Wilderness. The spotted bat is on the Watch list for the Clark County Multiple Species Habitat Conservation Plan (MSHCP) and is considered at moderate risk by the Nevada Bat Working Group. The spotted bat is found year-round in a wide variety of habitats from low elevation desert scrub to high elevation coniferous forests (Altenbach et. al, 2002) and is highly associated with rocky cliffs. Golden eagles may nest in the South McCullough Wilderness and forage in both the South McCullough and Wee Thump Joshua Tree areas. Swainson’s hawks may utilize the areas for foraging and perching, but these areas*

are well outside the breeding range of the species. Burrowing owls may also occur within both the South McCullough and Wee Thump Joshua Tree Wildernesses and are documented to be year round residents in southern Nevada. They are a federal Species of Concern, state protected, considered a high-priority evaluation species by the Clark County MSHCP, and considered a priority species by the Nevada Partners in Flight Working Group.”

Amazingly, the proposed industrial wind turbine project is being supported by the BLM despite the fact that it will potentially devastate large numbers of Federally protected, State protected, and county protected species on the lands adjacent to the South McCullough and Wee Thump Joshua Tree Wilderness areas. This means that lawsuits can be brought against the BLM and its associates in this destructive project at the Federal, State, and County levels.

THOUSANDS OF COURT CASES

(9) Researchers who are funded by companies whose goal it is to take advantage of government subsidies for building industrial wind turbines manipulate their research findings to show that the evidence concerning the health hazards of industrial wind turbines has not yet been proven, despite the fact that annually there are thousands of court cases being won by residents whose health and quality of life have drastically declined once a legion of industrial wind turbines was activated near their home. It needs to be recognized that the areas proposed by Crescent Peak Renewable represent the homes of tens of thousands of creatures whose health and quality of life will be dramatically decreased.

DEVASTATING FREQUENCIES

(10) As further proof of the devastating frequencies emitted by industrial wind turbines, something that isn't common knowledge is that in the early years of the first term of President Obama, a feasibility study was commissioned to look into the possibility of transforming the Nevada Testing Site into the world's largest photovoltaic solar energy plant. Unfortunately, the proposed project was diverted by Senator Harry Reid, who replaced the idea of solar panels with industrial wind turbines. Although Congress approved the project, it was immediately shut down when government engineers and researchers at Area 51 let the President and Pentagon know that the frequencies emitted by industrial wind turbines would completely interfere with America's advanced stealth technology tests. If the frequencies of industrial wind turbines could overwhelm the circuitry of our country's most modern stealth circuitry, one can only imagine how much damage it

can do to the even more delicate biological systems of all migrating birds, whom scientists now know rely on magnetic fields to accomplish their annual migrations.

FEDERALLY-PROTECTED ANIMALS OF SPECIAL INTEREST

(11) The lands on which the proposed industrial wind turbines would be built - biologically speaking - are an area of animals of special interest to the Federal government. Animals of special interest include desert tortoise, bighorn sheep, mule deer, and gila monsters according to BLM literature. When it comes to the desert tortoise, BLM literature states the following, “*The desert tortoise, a Federally listed species, occurs within the South McCullough and Wee Thump Joshua Tree Wilderness Areas. The entire Mojave population was federally listed as threatened in 1990. The desert tortoise is generally found below 4,100 feet. However, they may be found at elevations up to 5,000 feet.*” It stands to reason that if a Federally-protected species lives in two wilderness areas, it also lives in between those two areas and around those two areas. Also, it is within these same elevation levels that a majority of the planned industrial wind turbines are slated to be built. Such an action is not legal under Federal law.

Moreover, BLM literature also recognizes that “*Desert tortoises occupy the bajadas on the west and east sides of the South McCullough Wilderness and the entire Wee Thump Joshua Tree Wilderness. They may also be found throughout the northern portion of the South McCullough Wilderness. Population counts adjacent to the Wilderness indicate low to moderate densities. The Piute-Eldorado Critical Habitat Unit for the desert tortoise overlaps a small part of the east side of the South McCullough Wilderness and the whole of the Wee Thump Joshua Tree Wilderness.*”

Note the wording of the tortoise habitat as the “*bajadas on the west and east sides of the South McCullough Wilderness.*” That wording states that the desert tortoise populations are not just within the wilderness areas, but that significant populations also occupy the fringes of these areas, which are areas where the industrial wind turbines are being planned to be erected. An often touted 2017 wildlife study, conducted through U.C. Davis and published in the Journal of Wildlife Management, gained a lot of publicity from disingenuous wind energy developers when the study showed that there is significantly less predators on the lands around an industrial wind turbine. What the wind energy developers failed to mention was the other half of the study’s findings. There were less predators (spotted skunk, gray foxes, coyotes, bobcats, and mountain lions) because there were also less desert tortoises around industrial wind turbines. It seems that few species really want to be around such horrid things other than certain winged

insects. What was truly the most significant portion of the study and the part with the most implications was that desert tortoises tend to be attracted to dirt roads and washes in a desert because they make the easiest pathways for them to get around. In the case of the Crescent Peak Renewables project, there are plans for building and expanding more than 100 miles of dirt road at a width of 36 feet, which could serve as a magnet for a large percentage of the local desert tortoise population.

The two major downsides of attracting tortoises to such areas is the risk of being run over by construction and service vehicles and the fact that the study previously mentioned found that dirt roads in a desert act as funnels for predators, concentrating them in the vicinity of such dirt roads, which could lead to a higher mortality rate of desert tortoises. Compound that danger with the blasting and pounding of putting in the massive concrete bases for 400 to 700 foot tall industrial wind turbine poles and it is easy to see how much ground will be disturbed, and how many Federally-protected tortoises will become victims of being crushed or of being suffocated underground during that process.

COMPLETE REVERSAL OF ROAD POLICIES

(12) According to BLM literature in 2005, the need was recognized to apply conservation measures to *“Twelve miles of former vehicle trails in the South McCullough Wilderness and one mile in the Wee Thump Joshua Tree Wilderness, those not designated as a trail or retained as a foot worn hiking path, will be rehabilitated.”* Now, the BLM wants to allow Crescent Peak Renewables to build 93 miles of new roads 36 feet wide, in addition to allowing 15 miles of established roads to be expanded to 36 miles of roads, all of which are slated to be built adjacent to or round the wilderness areas.

GROUND DISTURBING ACTIVITIES

(13) What BLM literature said about the hazard of roads being built on or near the wilderness areas is eye opening. According to BLM literature, *“Ground disturbing activities identified in the plan may result in harassment, injury or mortality of desert tortoises and Gila monsters and/or destruction of their habitat. These activities include: trail construction and maintenance; construction of trailheads, vehicle pullouts and vehicle access point turnarounds; fence construction and relocation; removal of existing structures and installations; rehabilitation actions; and fire suppression actions. Prohibiting vehicle use in the cherry stem behind McClanahan Spring would prevent impact to vegetation, in particular the rosy two-toned penstemon and yellow two toned penstemon,*

sensitive plant species which inhabit this wash. Vehicle parking and turn around points will be established once sites are inventoried for sensitive species.”

Despite the BLM’s understanding of the dangers of ground disturbing activities, what the agency is proposing with their industrial wind turbine plan on the borders of the wilderness areas could be considered to potentially cause a thousand times more damage than what they admit could result from minor trail construction and maintenance, and that is the type of damage that doesn’t go away. There will be no rehabilitation of the roads that decimate the populations of burrowing animals such as kit fox, desert tortoise, badgers, ground squirrels, gila monsters, burrowing owls, and countless other burrowing creatures.

Moreover, the tremendous amount of land being impacted to install industrial wind turbine towers will send reverberations from the point of impact, causing potential widespread destruction of habitat not only at ground zero but also for miles around the construction sites. On top of all that, Crescent Peak Renewables wants to excavate the surrounding desert to accommodate for as many underground 34.5 kilovolt electrical cables as possible to run to and from each step-up transformer. The amount of ground that would be disturbed in such a project is astronomical.

BYE BYE FEDERALLY PROTECTED GILA MONSTER POPULATIONS

(14) Banded Gila monsters are known to occur in the South McCullough Wilderness in blackbrush and creosote communities. Gila monsters are typically found below 5,000 feet elevation and are associated with desert wash, spring and riparian habitats that integrate with complex rocky desert scrub landscapes. They spend over 95% of their lives underground using deep crevices and caves on rocky slopes for refuge from extreme winter and summer temperatures. Gila monsters are a Federal species of concern, a state protected species, and are listed as a high-priority evaluation species in the Clark County Multi Species Habitat Conservation Plan. Disturbing Gila monsters inside or outside the wilderness areas is illegal per many laws.

WHERE HAVE ALL THE BIRDLIFE GONE?

(15) A plethora of peer-reviewed journal articles over the past decade have demonstrated that raptors are being killed in large numbers in the United States and Europe, when their range coincides with industrial wind turbine areas. I am a part of a group that is amassing evidence on this topic, and the evidence of avian death rates is very disturbing indeed. In one eye-opening scholarly paper that reviewed reports of fatal bird collisions from 31 industrial wind turbine facilities in the U.S., bird carcasses in California were composed of 78% songbird bodies, which were supposed to be protected by the Migratory Bird Treaty Act (16 United States Code 703– 712). Per that publication, half the killed birds were nocturnal species that were migrating passerines.

When it comes to overall numbers, a frightening study published by The Wildlife Society Bulletin calculated that 573,000 birds per year, in the U.S., were victims of industrial wind turbines in 2013, which was 5 years ago, meaning those numbers have now dramatically increased. At the infamous Altamont Wind Resource Area in California, even conservative estimates show that more than 2,000 golden eagles have been killed by the industrial wind turbines there, and as the information below will show, those numbers may actually be beyond 4,000 golden eagle losses. Presently, the U.S. Fish & Wildlife Service estimates that only 40,000 golden eagles remain in the entire country, which means that anywhere from 5 to 10% of the entire population have already been killed off by that single facility. More specifically, in a 2000 to 2004 study, conducted by Dr. Shawn Smallwood, it was estimated that the Altamont Pass wind “farm” decimated an average of 116 golden eagles each year. Multiply 116 golden eagles annually times 37 years (since the facility started operations in 1981) and one can see that the numbers of fatalities are staggering. It is not just the eagles who wind up as victims at Altamont Pass. That same scientist estimated that each year, Altamont killed an average of 300 red-tailed hawks, 333 American kestrels, 380 burrowing owls, 2,526 rock doves, and 2,557 western meadowlarks.

Prior to his election as the President of the United States, while on the campaign train in Bismarck, ND., Donald J. Trump demonstrated his concern of this problem by emphasizing the avian catastrophe being created by industrial wind turbines, *“There are places for wind but if you go to various places in California, wind is killing... the eagles. You know if you shoot an eagle, if you kill an eagle, they want to put you in jail for five years. And yet the windmills are killing hundreds and hundreds of eagles. ... They’re killing them by the hundreds.”*

Although the Department of Fish & Wildlife has given virtually carte blanche permission for industrial wind turbine companies to kill eagles (there is now a limit of 4,200 bald eagles per industrial wind turbine facility per year and no limit on golden eagles, despite the fact that golden eagle population numbers are

less than a third of bald eagles). Even the U.S. Fish and Wildlife Service Director, Dan Ashe, admitted that as many 500 golden eagles a year are killed by collisions with wind towers, power lines, buildings, cars and trucks. By far, wind towers and their associated power lines are the biggest culprit.

In case these numbers sound dramatic, it must be kept in mind that those who are doing the majority of the reporting of bird fatalities are consultants who work for the wind industry itself, which is akin to hiring the fox to guard the hen house. Moreover, reporting is voluntary on the part of industrial wind turbine facilities, and even the U.S. Fish and Wildlife Service guidelines for reporting blatantly demonstrates how skewed they allow the actual data to be reported. Companies operating the industrial wind turbine sites are only advised to report the carcasses of avian victims within a 200 foot diameter of a suspected industrial wind turbine pole. The problem with that guideline is that modern blades on industrial wind turbines typically measure 110 to 124 feet, and according to studies, 80% of bird victims are flung beyond the 200 foot mark. To skew the numbers of victims even more, such companies only make counts every 30 to 90 days, in order to allow predators to greatly decrease the actual numbers of victims; and wounded birds, no matter how severe the damage, are not counted while they are still alive. Some organizations have estimated that based on the number of bird kills reported by these companies, the actual count could be between 10 and 20 times greater. As further proof of the Department of Interior's disregard of this ecological disaster, although they keep an official tally of bird kills reported from such companies, they do not release that information to the public.

While it is worth saving the birds solely for the sake of the birds themselves, nationally speaking, we would also be saving ourselves and our economy. There are some major economic and environmental issues that are associated with reduced populations of raptors, namely rising rodent populations. When those populations become unnaturally out of balance, especially in a desert environment such as our own, the decimation of raptors can result in an epidemic of rodent-carrying hantavirus, which the perpetrators of this misguided industrial wind turbine project would be legally and civilly liable to pay for. Likewise, the decimation of bats and songbirds means that insect pests might grow to plague proportions, wreaking havoc on agriculture and forestry industries, not to mention the human health hazards of disease carrying insects. To put the potential damages to nationwide agriculture and forestry industries in numbers, the U.S. Geological Survey calculated that the value of the pest-control services that bats alone provide for agriculture could range from \$3.7 billion to \$53 billion annually. As can be seen, the value of energy from industrial wind turbines is nothing compared to its costs.

FRAUDULENT GOLDEN EAGLE DENSITY SURVEY

(16) The construction region where the proposed industrial wind turbines are planned contains the highest known density of golden eagles in the region. Suspiciously, the EIS representatives for the Crescent Peak Wind (CPW) project purposely performed eagle surveys during the wrong seasons, which is an act that is completely contrary to standard protocol. Utilizing the services of a contractor (SWCA), surveys that were conducted too late in the season calculated the population density of birds and bats, including golden eagles, at a time when it was known that there were fewer of them. U.S. Fish and Wildlife Service protocol for eagle nest surveys calls for surveys to be done in Fall and Winter for this geographic area. This is because that is when eagles are beginning to nest. By the month of May, eagles have often fledged and nests may be unoccupied. If the applicant meant to provide legitimate data, they would have undertaken eagle nest surveys starting in November-December-January.

VIOLATION OF THE TORTOISE RECOVERY PLAN

(17) According to BLM literature, *“Areas of Critical Environmental Concern: The entire Wee Thump Joshua Tree Wilderness and approximately 3,850 acres of the eastern edge of the South McCullough Wilderness are located in the Piute / Eldorado ACEC. The ACEC was established to protect desert tortoise habitat within the Eastern Mojave Recovery Unit to meet the criteria of the Tortoise Recovery Plan.”*

Any reputable biologist and/or wildlife management expert can attest to the fact that the areas in between the ACEC and the two wilderness areas that the proposed industrial wind turbine company seeks to infringe upon are also critical to the tortoise habitat and associated tortoise populations. To allow such a project to be built in those areas is in direct violation of the *“Tortoise Recovery Plan.”*

POLLUTION OF CRITICAL SPRINGS

(18) Besides the 30 identified springs and seeps within the South McCullough Wilderness area, it is noteworthy that the BLM literature admits, *“several large springs are located just outside the wilderness.”* Such life-giving springs would likely become highly polluted or completely destroyed during the construction of industrial wind turbines and during the construction of more than a hundred mile of 36 foot wide service roads.

GOODBYE TO SOLITUDE DEPENDENT SPECIES

(19) The vital aspect of solitude will be discussed later in both the recreational section and the conclusion portion of this public comment, which includes a discussion on how the concept of solitude directly applies to the official Federal definition and mandate of a wilderness. In the meantime, when it comes to biology and the ecology of these areas, BLM literature has this to say about solitude, *“The remote location, steep terrain, and perennial springs of the South McCullough Wilderness support a variety of wildlife including crucial summer habitat for solitude dependent species. The Wee Thump Joshua Tree Wilderness is made up of a relatively dense and continuous stand of Joshua tree woodland and supports a diverse assemblage of birds. The wilderness and surrounding Joshua tree woodland have been recognized as an Important Bird Area by the Audubon Society.”*

Without solitude, there can be few if any solitude dependent species that remain. What the Crescent Peak Renewables project seeks to do is to annihilate all solitude from the area.

PROTECTED FLORA

(20) Not just protected fauna will be adversely affected by the completely misplaced industrial wind turbine project but so too are protected flora. BLM literature points out that *“Rosy twotone beardtongue (Penstemon bicolor var. roseus) is a BLM and Nevada Division of Forestry proposed sensitive species and a FWS species of concern. Yellow twotone beardtongue (Penstemon bicolor var. bicolor) is a BLM and Nevada Division of Forestry sensitive species and a FWS candidate species. Both plant species are found in washes, rock outcrops and crevices, or similar places receiving enhanced runoff, in the creosote-bursage, blackbrush, mixed-shrub, and lower juniper zones from about 2,500 feet to 5,500 feet.”*

These plant communities are represented by the areas of land that are located between the Wee Thump Joshua Tree Wilderness and the new Castle Mountain National Monument.

LOW FREQUENCY SOUND DAMAGE

(21) Besides the obvious massive destruction of habitat and the decimation of wildlife populations within those lost habitats that would occur if the wind turbines are built, there is no question as to whether the sound frequencies emitted

by industrial wind turbines cause damage to those creatures who are continuously exposed to it, as well as to humans who visit the area. It is generally recognized that Canada embraces alternative forms of energy as much or more than the United States, yet Ontario's Environmental Review Tribunal made a very enlightened proclamation concerning the health hazards of industrial wind turbine facilities. What they said was that the health debate should not be oversimplified as to whether wind turbines cause harm to humans or not, but in the face of overwhelming evidence, where facilities are placed too close to residents, the debate of health risks has now evolved to one of degree. In other words, Canadian regulators have stated, on the record, that wind-turbine noise actually does cause harm to human beings (especially stress-disorder type diseases) when the turbines are built too close to homes. This was far from a politically-motivated statement since their findings were corroborated by a Harvard trained Ph.D. and published in the peer-reviewed Bulletin of Science, Technology & Society journal.

Since the low frequencies emitted by industrial wind turbines have been conclusively shown to be harmful to people, imagine how much more devastating such frequencies are to species with far more sensitive hearing. When one reviews the mass of scholarly studies on the issue, there is no longer any room for doubt that the noise coming from the giant blades of industrial wind turbines negatively impacts the quality of health of humans and other creatures. In fact, in New Zealand (another country that has been seen as a huge proponent of alternative forms of energy), studies have concluded that people who live within 2 kilometers of industrial wind turbines have been found to have a lower overall quality of life, lower physical quality of life, and lower environmental quality of life. Such victims of industrial wind turbine noise also report experiencing significantly lower quality of sleep. There is a rapidly growing amount of literature by doctors, acousticians, academics, and health professionals that focus on the adverse health effects of being in the vicinity of industrial wind turbines.

It is interesting to note that the parent company of Crescent Peak Renewables, the company which seeks to destroy the most important section of Nevada's pristine desert areas, is not based in Nevada but in Sweden. Therefore, it is worth pointing out that the portion of the world where the environmental backlash against industrial wind turbines appears to be the strongest is in Europe. Recent reports show that 518 organizations in 23 European countries are legally fighting this growing environmental menace. In the United States, where we are still somewhat behind the European protests, already there are 140 anti-industrial wind turbine groups. Public awareness of the dangers of industrial wind turbine projects are growing by leaps and bounds all over the world, including Australia.

BLM DOUBLE-STANDARD ON NOISE DEGRADATION

(22) On the one hand, while the BLM would like to pretend that the noxious noise from industrial wind turbines poses no negative attributes to health, happiness, or welfare for humans or wildlife, the BLM is quick to point out the ill effects of airplane noise. In BLM literature concerning the wilderness areas being discussed in this public comment, they state “*a proposal exists for the construction of a cargo/passenger airport between Primm and Jean. Aircraft overflights could degrade the solitude of the Wilderness areas if flight paths are set over the two areas.*” In that same report, the BLM vowed to enlist the aid of the FAA to change the flight patterns through noise abatement plans in order to avoid degrading the wilderness areas. The proposed industrial wind turbine project, which the BLM supports, will degrade the nearby wilderness areas from noise pollution far more than any amount of air traffic noise could ever do.

II. Objections Based on the Potential Harms to Visual Resources

UNFOUNDED ATTEMPT TO REDUCE VISUAL RESOURCE STATUS

(23) Despite the fact that the BLM has proposed reducing the visual status of the affected wilderness areas in order to allow the wilderness areas under their so-called stewardship to be virtually destroyed, a preliminary content analysis study of the BLM’s 114-page Wilderness Management Plan and Environmental Assessment for the South McCullough Wilderness and Wee Thump Joshua Tree Wilderness in 2005 reveals the following eye-opening word frequencies within their documentation that demonstrate just how visually special these wilderness areas are recognized to be by the BLM:

wilderness/wildland = 843

spring(s) = 336

path(s)/trailhead/trail(s) = 211

reclaimed/recover/rehabilitated/rehabilitating/rehabilitation/restore(d) = 193

Joshua tree(s) = 173

camp(s)/camping/campsite(s) = 170

vegetation/plants = 144

activities/activity/uses = 138
wildlife = 138
species = 128
natural/naturalness = 124
equestrian/horse(s)/horseback/horsepack/riding = 119
camp/camping/campsite(s) = 110
backpack/day-hiking/hike/hiked/hikers/hikes/hiking = 105
recreation/recreational = 101
native/indigenous = 66
artifacts/cultural/culturally = 64
animal(s) = 62
habitat = 61
wash(es) = 61
potential = 60
plant(s) = 57
tortoise(s) = 57
protect(s)/protected/protecting/protection/protective = 52
pine/pinyon = 50
riparian = 49
solitude = 43
hunt/hunter(s)/hunting = 42
preserve(s)/preserved/preservation = 37
pack = 36
sensitive = 36
history/historic(al)/prehistoric = 34
outstanding = 30
badger = 29
mountain = 29
bird(s)/nesting = 26

rare/endangered = 26
primeval = 24
game = 22
threatened = 21
primitive = 18
ecosystem = 16
woodland(5) = 16
ecological/environment = 14
lizards/reptiles = 14
trees = 14
undeveloped = 14
bat = 13
sights = 13
critical = 12
visual/viewing = 12
conservation = 11
diversity = 11
unconfined = 11
untrammeled = 11
bighorn = 10
importance/important = 10
significance/significant = 10
penstemon = 8
gila monster = 8
fox = 6
coyote = 5
deer = 4
enjoyment = 4
hawks = 4

juniper = 4

Perhaps it is most telling to let the BLM describe the Wee Thump Joshua Tree Wilderness area themselves from one of their online brochures, in order to show how much they fully understand the level of beauty of that particular wilderness, *“The Wee Thump Joshua Tree Wilderness, west of Searchlight, Nevada, is relatively small for a designated wilderness, at just 6,050 acres. But what it may lack in size, it more than makes up for in stunning natural history. The name Wee Thump, or ‘ancient ones’ in the Paiute language, tells the story of these Joshua trees. Growing just half an inch per year on average, the stand is home to some of the oldest and largest Joshua trees on the planet. These ancient ones have grown tall in the silence of the desert, some rising to more than 30 feet over 900 years.”*

Also on the BLM portal is this remark, *“BLM Nevada manages outstanding National Conservation Lands that inspire and bring to mind the beautiful natural history and unique cultural history of the area.”* The Wee Thump Joshua Tree Wilderness area is one of the prime National Conservation Lands that the BLM was previously so proud of that it has been consistently mentioned on NCL brochures and even included in National Geographic literature in association with the BLM. Until the BLM wanted to collect leasing fees from the Crescent Peak Renewables company, they freely admitted the sublime visual classification of this region was not overstated.

It is eye-opening that BLM literature talks about the importance of this portion of our desert’s visual resources in such words, *“The natural setting may be minimally modified for recreation access to protect natural resources. Management decisions will support healthy, viable, and naturally distributed wildlife and plant populations. Any necessary facilities will be located where rarely viewed by visitors.”*

Yet, despite the awareness of the stunning visual beauty of this area, the BLM is proposing that the views of the affected areas be altered for scores of miles all around. In fact, there will hardly be a place in the South McCullough Wilderness or the Wee Thump Joshua Tree Wilderness or the Castle Mountain National Monument or the eastern Mojave National Preserve where the industrial wind turbines won’t be visible. Instead, the BLM is proposing to go from *“Any necessary facilities will be located where rarely viewed by visitors”* to *“Unnecessary facilities will be placed where visitors will rarely be able to find a spot in the area where they are not an eye sore.”*

No one has the right to destroy the pristine visual beauty for such a wide-ranging, unique, and stunningly beautiful region. Despite that obvious fact, since the time that the first scoping meeting that was held in Searchlight, the BLM has

made it quite clear both orally and in writing that they are seeking to reduce the Visual Resource Management objectives for the Wee Thump Joshua Tree Wilderness, not because such a reduction is justified in any way, but simply to give permission to Eolus Vind AB to destroy the scenic value of the region in the name of ungainful profit. Such a heinous goal on the part of the BLM is in direct violation of Section 103 (c) of the Federal Land Policy and Management Act of 1976, 43 U.S.C., which “*Identifies ‘scenic values’ as one of the resources for which public land should be managed.*” In other words, scenic values are a right of the American public and a treasure that is not to be squandered.

Moreover, according to Visual Resource Management Federal Policy of that same act, “[*It] is the intent and policy of both the Department and the Bureau of Land Management that the visual resource values of public lands must be considered in all land-use planning efforts and surface disturbing activities... visual values must be considered and those considerations documented in the decisionmaking process, and that if resource development/extraction is approved, a reasonable attempt must be made to meet the VRM objectives for the area in question and to minimize the visual impacts of the proposal...The Bureau has a basic stewardship responsibility to identify and protect visual values on public lands...*”

What are the Visual Resource Management objectives for the Wee Thump Joshua Tree Wilderness? The wilderness area in question was originally designated a Class II Objective, which does not mean that it is any less scenic than a Class I Objective. It’s just that a Class II Objective allows for a little more non-intrusive development such as low impact parking areas, necessary signage, equestrian staging areas, trails, etc. Along those lines, BLM literature states, “*The objective to this class is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.*”

There is no way that the Crescent Peak Renewables project with its hundreds of 400 to 700 foot industrial wind turbines and more than 100 miles of roads, not to mention transmission lines, substations, control stations, meteorological towers, and other structures associated with wind energy, could be said to do anything other than completely attract the attention of a casual observer, and there is no way that such monstrosities repeat the basic elements of form, line, color, and texture found in the natural environment. In fact, an obtrusive industrial wind turbine that is 400 foot tall can be seen on level ground from 24.5 miles away, while a 700 foot tower on level ground can be seen from as far away as 32.4 miles. Considering that

a number of these towers are being designed to be built high atop ridges, they will be an eyesore for several times the distances that were just mentioned, sadly making them visible from the Lake Mead National Recreational Area and as far away as Arizona.

Moreover, having properly conducted a VRM the first time and having established the wilderness area visual classification, such a classification should not be changed. According to the BLM Manual Handbook 8410-1, *“Once the visual resource management classes are established... they are more than merely guidelines. Rather, having been developed through the RMP process, meeting the objectives of each of the respective visual resource classes is as much a part of the RMP mandate as any other aspect of the resource allocation decisions made in the RMP... All surface disturbing projects must be designed to meet the corresponding VRM management class objectives... the “valid existing rights” to which these management plans refer are rights existing at the time the management plans are adopted. In other words, it is not expected that BLM officials will authorize the creation of future rights whose excise would be inimical to the very values which a management plan seeks to foster.”*

In other words, any ground disturbing project must be designed to meet the goals of the VRM class objectives, not the other way around. Previous BLM personnel who developed the original Resource Management Plan (RMP) calculations would have done so in a legitimate manner, by the book, whereas now the BLM is looking at the landscape of Nevada’s premier desert wilderness area through greedy eyes in order to determine how to reduce the former carefully considered visual rating so that they can justify allowing the destruction of the visual value of the Wee Thump Joshua Tree Wilderness area that is supposed to be under their stewardship. There is nothing legitimate or legal about such an attempt, yet in the present case of the Wee Thump Joshua Tree Wilderness, the BLM has basically stated to the public, *“We know it’s currently under a class 2 visual resource mandate but don’t worry, we’ll just change it to a lower classification so the industrial wind turbines can be built.”* If VRM/RMP’s are conducted based on wants rather than on facts, no RMP could ever be legally considered legitimate. The process isn’t supposed to be a survey whose assessment is based on the biased whims of a single acting agent with a preset agenda, and that is especially true when the BLM is attempting to drastically change a previous properly conducted RMP.

SEQUOIA NATIONAL PARK OF JOSHUA TREES

(24) It is no exaggeration to proclaim that this area, as well as much of the

surrounding region that would be devastated by the industrial wind turbine project, could and should be known as the “*Sequoia of Joshua Trees.*” No one would dream on putting industrial wind turbines around and through the magnificent redwoods of Northern California and no one should consider allowing the same travesty around the Sequoia of Joshua Trees in Southern Nevada, especially to rare living plants that have been estimated to be over 900 years old.

STUNNING BEAUTY COMMENTS THROUGH THE EYES OF THE WORLD

(25) As the author of this public comment document, I can personally rave about the beauty of these wilderness areas and the adjacent lands in between, but it is more telling to let others from around the world offer their heartfelt remarks:

“The wilderness area is surrounded by dirt and paved roads that give access to the far reaches of the forest and some amazing views out over the wilderness area towards Spirit Mountain to the southeast.” - BirdAndHike.com

“Desert Beauty: This is probably the most beautiful part of the Nevada desert in my eyes. It is well worth the visit. The Joshua trees bloom once every two years in late February/early March (they will bloom again in 2018), but they are absolutely magnificent any time of year.” Jacquelyn P., Des Moines, IA - TripAdvisor.com

“Marvels of life: The view of the Joshua trees is nature at its best.” Lucy T., Montreal, Quebec, Canada - TripAdvisor.com

“Peace and Quiet Though a Bit Small: You can have some peace and quiet here and the wilderness is a bit small in size but then again how much bigger do you need it. There's an old growth Joshua Tree forest here which is spectacular.” Dino S., North Las Vegas - TripAdvisor.com

“Wee Thump Joshua Tree Wilderness is a place of breathtaking panoramas and natural history... On average, Joshua trees grow only a half-inch per year. Many of the trees in this wilderness are more than 30 feet tall and could be more than 900 years old, making them some of the oldest and largest Joshua trees in the world.” - Wilderness.net (The University of Montana)

“Spend a day with elders of the tribe: Usually, wilderness designation takes place in the high mountains and rugged canyons. It also tends to happen with parcels of land that have already been identified by the land-management agency as having wilderness quality. But there's one parcel that the Clark County Conservation of Public Land and Natural Resources Act of 2002 proposed as wilderness that breaks these patterns. Once you visit the Wee Thump Joshua Tree

Wilderness, you'll see why. Looking at a map, the area doesn't look like an obvious candidate for wilderness. It's an almost completely flat, relatively small (only 6,050 acres in all) triangular area surrounded by a power line, highway and dirt roads. Once you get out of your car, however, you'll see immediately the value this area holds. Joshua trees. Lots of them. A beautiful old-growth forest of them. A 2001 article in the journal Great Basin Birds said, 'The large expanses of large, old Joshua trees are perhaps one of the most impressive stands of their sort in the country. Certainly, they make for one of the most thrilling natural spectacles in all of Nevada.' Wee Thump means 'ancient ones' in the Paiute language. Scientists have learned that Joshua trees often grow as little as a half-inch per year, and many of them stand over 30 feet tall. Walk among them, and you'll know intimately that you're in the company of grand and wise giants, the Mojave's version of an old-growth forest. Wee Thump was the first unprotected tract of public land to be designated wilderness in Nevada. This is a direct result of the Nevada Wilderness Coalition's Citizens' Wilderness Proposal for Nevada's Mojave Desert Region. ” - NevadaWilderness.org

“The phrase ‘wee thump’ is of Paiute origin and means ancient ones, and in this case references the spectacular Joshua tree forest covering this site.” - Audubon Society

“If your goal is to find a peaceful and beautiful corner of desert solitude, Wee Thump is the place.” - Trails.com

“The Joshua trees in this area were some of the largest I've ever seen.” - KensPhotoGallery.Blogspot.com

“I would recommend going to this area, like the Castle Mountains in Nevada, and hiking, because I think what's not being said here is how absolutely beautiful this place is. It is really pristine... this is a really wild, remote area, really biologically diverse.” - Laura Cunningham, Basin and Range Watch

“The amount of very large, very old Joshua trees make this a truly special place.” - TalesFromTheDesert.com

“...a tremendous array of old-growth Joshua trees dominates the triangle of desert, regarded by some as ‘one of the most thrilling natural spectacles in all of Nevada.’ - Wilderness.org

III. Objections Based on the Potential Harms to Cultural Resources

NO PROPER CULTURAL INVENTORY TAKEN

(26) When it comes to cultural resources, the BLM has seemingly been remiss in taking a proper inventory of the wilderness areas in question or the lands adjacent to them. According to Section 106 of the National Historic Preservation Act of 1966, the BLM was required to take into account the effects of their undertakings on “*historic properties.*” Even though these areas have been managed by the BLM for decades, BLM planning literature stated, “*Little is known regarding cultural resources within the South McCullough Wilderness. Only 23 acres surrounding McClanahan Spring have been inventoried; no artifacts or archaeological sites were reported. In the neighboring BLM California Desert District, extensive statistical sampling demonstrates a strong correlation between prehistoric sites and mesquite stands located within three miles of a spring. Similar correlations are expected to occur in these areas. Predicted site types include rockshelters, open campsites, hunting blinds, lithic procurement areas, pinyon nut caches, rock art, and agave roasting pits. No cultural resource inventories have been conducted within the Wee Thump Joshua Tree Wilderness Area.*”

While that statement was originally made 13 years ago, I find no newer information in the BLM literature that more recent cultural resource inventories have taken place, despite the extensive finds that have been made on the California side of the border. Still, the Nevada district of the BLM is willing to issue permits that could cause wholesale destruction to such cultural heritages in Nevada without having performed the inventory that they were required by law to do.

HISTORIC WAGON TRAIL

(27) Despite a dearth of Federally published information concerning cultural resources in these areas, private sources regularly mention obvious historic sites in the region, “*There is only one designated trail in the Wee Thump Joshua Tree Wilderness, and that trail is along the southern edge of the area on an old wagon trail known as the ‘Eldorado Trail.’ The Eldorado Trail was built to serve the mining areas in the Eldorado Mountains near Nelson back in the day.*” - The ArmchairExplorer.com

HISTORIC RANCH

(28) Opposite the Wee Thump Joshua Tree Wilderness is the Walking Box Ranch, which is a richly historic cattle ranch that was purchased by Hollywood

actors Rex Bell and Clara Bow in 1931. In 2005, the BLM purchased the Walking Box Ranch with a grant from the Southern Nevada Public Lands Management Act. Therefore, the BLM has no right to destroy the visual resources surrounding a historic attraction that was purchased through Nevada taxpayer funded sources.

IV. Objections Based on the Potential Harms to Tribal Interests

SACRED TRIBAL VALUE

(29) The entire region of the proposed industrial wind turbine project is in view of the highly sacred Spirit Mountain, the ‘Place of Creation’ for many Colorado River Indian Tribes. The recently created Castle Mountain National Monument Proclamation recognizes a diversity of natural values found on the Nevada side of its border, including sacred tribal values. For example, the Proclamation states, *“Views from Hart Peak encompass vast wilderness and distinctive peaks, including Spirit Mountain in Nevada, a sacred site to many Native American tribes. The remoteness of the Castle Mountains area offers visitors the chance to experience the solitude of the desert and its increasingly rare natural soundscapes and dark night skies.”*

To install such monstrous industrial wind turbines around the Castle Mountain National Monument would completely degrade the view toward sacred Spirit Mountain, as well as completely degrade the view from Spirit Mountain toward the National Monument, National Preserve and both Wilderness areas.

GOOD BYE DARK NIGHT SKIES

(30) Moreover, it was mandated in the Castle Mountain National Monument proclamation that the dark night skies are a resource that are the right of the citizens of the United States, and that they needed to be preserved. Polluting the night skies with 400 to 700 tall industrial wind turbines with flashing lights on top is in complete violation of that dark night skies mandate.

V. Objections Based on the Potential Harms to Recreation

WORLDWIDE RECREATIONAL INTEREST COULD BE LOST

(31) One of the quickest ways to determine the recreational interest of an area is to “Google it.” For instance, when one puts “*Wee Thump Joshua Tree Wilderness*” into the Google search box, they receive 56,600 results. Those results are from people all over the world talking about their favorite corner of the desert on this planet, which for untold numbers of people is the Wee Thump Joshua Tree Wilderness. That is a lot of interest from around the nation, and from abroad, and says much about the recreational attraction of the area!

It seems amazing that I need to point out to the BLM what the recreational opportunities of this area are when they have admitted the great recreational value of these wilderness areas themselves in online brochures, and I quote, “*With few visitors making their way into this wilderness, opportunities for solitude abound. This impressive stand of Joshua trees makes for fascinating bird watching, and the gentle slope of the land allows for relaxed hiking. The 3-mile Joshua Tree Trail follows an old wagon road previously used by mining operations in the surrounding areas.*”

The BLM’s 2005 Wilderness Management Plan and Environmental Assessment sums up the superb recreational opportunities of this area quite nicely, “*The central western portion of the South McCullough Wilderness and the entire Wee Thump Joshua Tree Wilderness provide good opportunities for solitude while the remainder of the South McCullough Wilderness provides outstanding opportunities for solitude. The South McCullough Wilderness provides outstanding recreation opportunities for hiking on and off trail, horseback riding, hunting, exploration, and camping. The Wee Thump Joshua Tree Wilderness provides outstanding recreation opportunities for nature observation and particularly birding and viewing Joshua trees. The natural character of the two areas is generally free of human imprint except for several former vehicle trails, developed springs, mining disturbances, and a livestock operation. The primeval character is intact except for the occurrence of some introduced plants, primarily annual grasses. Additional Wilderness features of the South McCullough Wilderness are bighorn sheep, desert tortoise, and springs. Additional Wilderness features of the Wee Thump Joshua Tree Wilderness are Joshua trees and songbirds.*”

Other organizations echo the same sentiment, “*Silence is common throughout these gentle slopes. Infrequent visitor use and the ability to lose oneself in the maze of Joshua trees result in outstanding opportunities for solitude.*”

Although the Wilderness is bordered by dirt roads and a highway, the majority of the area is characterized by long periods of natural quiet.” - Wilderness.net (The University of Montana)

VIOLATION OF WILDERNESS MANAGEMENT OBJECTIVES

(32) According to the BLM’s Wilderness Management Objectives for the South McCullough and Wee Thump Joshua Tree Wilderness areas, under the National Wilderness Management Goals, the promise the BLM made to the American public was to *“Provide outstanding opportunities for primitive recreation for hiking and horseback riding with minimal supporting actions and primarily without trails.”* Yet now they want to allow an extensive network of a hundred-plus miles of destructive roads around and throughout the neighboring wilderness areas. That truly counts as a breach of contract.

INDUSTRIAL WIND TURBINE FIRE HAZARDS

(33) In that same BLM literature, it is stated that the BLM will *“Provide for the use and enjoyment of the wilderness in such a way that protects natural conditions and uses through minimal regulation of visitor activities... Maintain or enhance the natural appearance of the Wilderness areas by removing unnecessary facilities and minimizing or restoring human caused surface disturbances. Preserve the primeval character and influence of the Wilderness areas by reducing non-native plants in favor of native plants. Manage for healthy, viable, and naturally distributed wildlife populations with the least amount of trammeling actions necessary. To preserve the primeval character and influence of the wilderness... Prevent fire where fire is not a natural effect in the ecosystem or where human life or property is threatened.”*

It must be pointed out that industrial wind turbines create a common threat of fire that is not natural to the ecosystem, and on which adequate research and news reports exists to highlight the danger that is being completely ignored by the BLM. When one reads wind industry propaganda, it would be easy to assume that fires in industrial wind turbines are rare, when the opposite is the case. In 2014, it was reported in the Fire Safety Science-Proceedings of the Eleventh International Symposium, *“The three elements of the fire triangle, fuel (oil and polymers), oxygen (wind) and ignition (electric, mechanical and lighting) are represent and confined to the small and closed compartment of the turbine nacelle. Moreover, once ignition occurs in a turbine, the chances of externally fighting the fire are very slim due to the height of the nacelle and the often remote location of the wind*

farm. Instances of reports about fires in wind farms are increasing, yet the true extent of the impact of fires on the energy industry on a global scale is impossible to assess. Sources of information are incomplete, biased, or contain non-publicly available data. The poor statistical records of wind turbine fires are a main cause of concern and hinder any research effort in this field... We have found that fire is the second leading cause of catastrophic accidents in wind turbines (after blade failure)... The main causes of fire ignition in wind turbines are (in decreasing order of importance): lighting strike, electrical malfunction, mechanical malfunction, and maintenance., The fire problem in wind turbines arises as a result of large amounts of highly flammable materials (hydraulic oil and lubricants, composite materials, insulation, and polymers) contained within the nacelle of the wind turbine and packed in close proximity to potential ignition sources such as overheated mechanical components (hot surfaces) and electrical connections that could fail. Once a fire is ignited in a wind turbine, the situation rapidly escalates because the high wind favoured by turbine locations enhances the supply of oxygen and, hence, the fire growth. In over 90% of wind turbine fires reported, a total loss of the wind turbine, or at least, a severe structural failure of the major components (blades, nacelle, mechanical or electrical components) has been reported. The most common cause of accidents in wind turbines is blade failure with 251 registered instances (19%). It is closely followed by fire with a total of 200 incidents recorded, which is 15% of all the reported accidents. This represents on average 11.7 fires per year (~one fire accident per month)... However, these numbers are believed to be only the tip of the iceberg, as many cases are not made public, and hence go unregistered [8]. This statement is supported by the fact that the British newspaper The Telegraph [14] obtained information from the wind industry reporting that about 1500 wind turbine accidents occurred within the United Kingdom (UK) alone between and 2006 and 2010. This was confirmed independently by Renewable UK... [even though] statistics for the UK in that period documented only 142 accidents, which is just about 9% of what The Telegraph reported. Thus, we can argue that the publicly available tip of the iceberg represents about 10% of the total number of fires, and that a rough average estimate is 117 fire accidents per year..."

As can be seen, it is likely that the true figures, in regard to the number of industrial wind turbine fires per year, amount to 10 times the statistic admitted by the industry. As disturbing as those findings are, it needs to be kept in mind that the 117 fire accidents listed per year was in the UK alone. Wildfires caused from burning industrial wind turbines is a very real and likely threat to our Joshua tree forest.

SOUTH MCCULLOUGH WILDERNESS RECREATIONAL OPPORTUNITIES

(34) BLM literature is quite enthusiastic about the recreational opportunities in the South McCullough Wilderness, *“The South McCullough wilderness is generally within an hour drive of Las Vegas. Year round visitation to the Wilderness is possible, although light snow, common at the higher elevations in winter, and hot temperatures over 100 degrees, common at lower elevations in summer, limit visitation. The wilderness ranges in elevation from about 3,000 feet to 7,026 feet at the summit of McCullough Mountain. The differences in elevation offer hiking and horseback riding opportunities ranging from creosote desert to pinyon woodland... Primitive recreational opportunities are outstanding because of the size of the area, variety of topography, diverse vegetation, scenic views, wildlife, and, in most areas, solitude. In the majority of the South McCullough Wilderness a sense of remoteness and isolation is experienced. In the McCullough Range numerous draws, ravines, rocky outcrops, ridges, and occasional canyons are found that create secluded locales. Those locales, the wilderness’ large area, low visitation levels, the need for route-finding skills, and, at middle and higher elevations where Joshua trees, pinyon, and juniper provide screening, provide outstanding opportunities for solitude.”*

It is amazing how often the term “solitude” is written in BLM literature, despite the fact that the bureaucracy supports the idea of destroying every last vestige of solitude in these areas with industrial wind turbines, and Crescent Peak Renewables has already stated their intention of using helicopters to put industrial wind turbines within the pinyon pine ridge forest on top of the McCullough Range.

SOLITUDE & WELL-BEING DO NOT COINCIDE WITH TURBINES

(35) It must be pointed out that there are numerous news reports concerning industrial wind turbine projects that were built in peaceful hamlets around Europe, Canada, New Zealand, and Australia where the quality of the residents lives vanished the moment the industrial wind turbines were activated. A common theme in those reports speaks of the many home owners who had lived in that region for decades but had to completely abandon their homes due to the effect that the gigantic turning blades had on their nerves, mental well-being, and general health.

The point is that potential visitors to our natural wilderness environments will find it physically impossible to be able to enjoy their visits as they should. It’s likely that people will choose not to view these amazing desert resources. After all, if people are inclined to go so far as to abandon the home they loved for 30 or more

years, due to the noxious sound frequencies of industrial wind turbines, imagine what a greater negative effect such industrial wind turbines will have on tourism.

PRIVATE RECOGNITION OF RECREATIONAL OPPORTUNITIES

(36) A popular ecological website has this to say about the recreational opportunities of the Wee Thump Joshua Tree Wilderness, *“the BLM ‘Spirit of Wilderness’ Trail provides access from the pavement, and routes lead to the ‘Heart of the Wee Thump’ or along the El Dorado Wagon Trail, and this is a great place to spend a day with the family wandering about, listening to the woodpeckers and the wind in the trees, and enjoying a picnic lunch in the desert. The historic corral near the southeast corner of the wilderness area is a good place to stop and look for spring wildflowers...Wee Thump Joshua Tree Wilderness Area provides sublime landscapes with nothing but the wind in the Joshua trees and the calls of Gilded Flickers to break the silence. This is a place to wander about, ride horses, hike, hunt, and photograph the spring wildflowers.”* - BirdAndHike.com

Typical of comments from outdoor enthusiast websites about the wilderness areas in this part of the world are such words as, *“great place to spend a day with the family...”* This is a pristine desert region that begs to be enjoyed by day hikers or horseback riders or campers or backpackers, and there are so many outdoor activities, sights, and sounds to savor there throughout the year. The recreation value of the lands in and around the proposed industrial wind turbine sites are endless, and large numbers of potential visitors already know it.

IRREPLACEABLE VALUE OF SOLITUDE

(37) BLM references to solitude are a dominant theme throughout their literature concerning the public value and management responsibilities of these areas, *“In the west central portion of the South McCullough Wilderness and the entire Wee Thump Joshua Tree Wilderness, visitors will have good opportunities for solitude.”*

There is no such thing as solitude when one is within sight or sound of industrial wind turbines, not even if they’re 10 or 20 miles away.

VI. Concluding Remarks, Concerns, and Objections

CONTRADICTING EVERYTHING AN EIS STANDS FOR

(38) One of the most disturbing portions of the recent environmental impact statement (EIS) literature from the BLM that I have found to date comes from a document concerning this very misguided industrial wind turbine project. In that document the BLM states, *“The associated Environmental Impact Statement (EIS) will identify needs for the construction, operation and eventual decommissioning of wind turbines and associated facilities necessary to generate up to 500 megawatts of electricity.”*

What is particularly disturbing about that statement concerning the Crescent Peak Renewable’s obvious highly skewed EIS that is currently being prepared on behalf of the BLM are the three telltale words *“will identify needs.”* What this says is that the EIS is not being conducted to determine if the project should or should not be allowed, but it is being conducted to determine how to assure that such a highly destructive project receives the official green light from the BLM. Such a statement is in direct contrast to everything an EIS stands for.

VIOLATION OF NATIONAL WILDERNESS MANAGEMENT GOALS

(39) Recent BLM plans stand in direct contrast to what the BLM wrote and published in 2005, National Wilderness Management Goals *“1) To provide for the long-term protection and preservation of both areas’ wilderness character under a principle of nondegradation. The area’s natural condition, opportunities for solitude, opportunities for primitive and unconfined types of recreation, and any ecological, geological, or other features of scientific, educational, scenic, or historical value present will be managed so that they will remain unimpaired. 2) To manage the Wilderness areas for the use and enjoyment of visitors in a manner that will leave the areas unimpaired for future use and enjoyment as wilderness. The wilderness resource will be dominant in all management decisions where a choice must be made between preservation of wilderness character and visitor use. 3) To manage the Wilderness areas using the minimum tool, equipment, or structure necessary to successfully, safely, and economically accomplish the objective. The chosen tool, equipment, or structure should be the one that least degrades wilderness values temporarily or permanently. Management will seek to preserve spontaneity of use and as much freedom from regulation as possible. 4) To manage nonconforming but accepted uses permitted by the Wilderness Act and subsequent laws in a manner that will prevent unnecessary or undue degradation of the area’s wilderness character. Nonconforming uses are the exception rather than the rule;*

therefore, emphasis is placed on maintaining wilderness character.”

Later, in that same planning guide document, under the third goal, BLM documentation states the importance of *“Preserving the naturalness and primeval character and influence of the Wilderness areas. Management of Threatened & Endangered Species, and other species of special interest or concern. Trapping, transplanting, and relocating wildlife. Development of new wildlife water sources. Management of fire. Management of exotic and invasive plant species. Inventory, monitoring, and research of flora, fauna, and archaeological resources.”*

It is quite obvious that allowing industrial wind turbines around the wilderness areas would have quite the opposite effect.

GOING BACK ON THE PROMISE TO PROTECT SURROUNDING LANDS

(40) Later comments related to the fourth goal state the BLM’s mandate of *“Managing special non-wilderness land uses allowed by the Wilderness Act. Preventing cattle drift into the closed McCullough Mountain allotment. Management of grazing facilities inside Wilderness. Outreach to other governmental agencies to foster compliance with wilderness goals.”*

According to this fourth goal, the BLM had originally recognized the importance of protecting the lands around the wilderness areas, which are those same lands that they now propose to wantonly destroy. Once again, their present actions represent a clear breach of contract against the American public.

TAKING THE WILDERNESS QUALIFICATION OUT OF THE WILDERNESS

(41) It needs to be kept in mind that the South McCullough and Wee Thump Joshua Tree areas were congressionally deemed a wilderness area. Within BLM literature, what qualifies as a wilderness is succinctly described as thus, *“Wilderness characteristics are described under five categories: 1) untrammeled; 2) natural and primeval character; 3) undeveloped; 4) outstanding opportunities for solitude or a primitive unconfined form of recreation, and, 5) other wilderness features.”*

If the proposed industrial wind turbine project is allowed to proceed near wilderness areas, both of those national treasures will legally cease to qualify as wilderness areas. It is impossible for a wilderness to be immersed in a non-wilderness environment and still qualify to be a wilderness, and being within sight and/or sound of industrial wind turbines will make the area a non-wilderness environment. There must be adequate transition zones of great breadth and depth to

preserve a wilderness. To have the industrial wind turbines built on their borders or even within 10 or 20 miles of those borders would mean that the wilderness areas would have lost their untrammelled characteristics, as well as their primeval character, since they would be surrounded by developed lands, and all opportunities for solitude will have been permanently sacrificed. In short, those pristine wilderness areas would immediately cease to officially or legally qualify as wilderness areas. According to the National Wilderness Management Goals (specifically written with the South McCullough Wilderness and Wee Thump Joshua Tree Wilderness), everything about the proposed industrial wind turbine project stands in direct opposition to those noble listed goals.

Along these same lines, it is also instructive to review what The Wilderness Act provides as a detailed definition of a wilderness according to 16 U.S. Code 1131(c) and 43 U.S.C. 1702(i) of the National Wilderness Preservation System, “*A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this chapter an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.*”

No way can the South McCullough or Wee Thump Joshua Tree Wilderness areas be considered wilderness if such a noticeable imprint of man is harshly stamped onto the environment in the form of industrial wind turbines. Moreover, such monstrous industrial wind turbines fly in the face of the mandate that a wilderness area is a place “*without permanent improvements or human habitation.*” The industrial wind turbines being planned to closely border these wilderness areas are illegally being designed to be permanent.

THEFT OF AN ENDURING RESOURCE OF WILDERNESS

(42) According to The Wilderness Act, *“In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness. For this purpose there is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as “wilderness areas,” and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character; and for the gathering and dissemination of information regarding their use and enjoyment as wilderness; and no Federal lands shall be designated as ‘wilderness areas’ except as provided for in this chapter or by a subsequent Act.”*

Per Federal law, the wilderness aspects of these areas are to be enduring, not for sale by the BLM. The citizens of the United States own these areas for perpetuity, not the BLM.

BREACH OF PROMISE / BETRAYAL OF PUBLIC TRUST

(43) As previously mentioned, there is no such thing as solitude and industrial wind turbines in the same vicinity. Yet according to the BLM’s 2005 Wilderness Management Objectives, for the South McCullough and Wee Thump Joshua Tree Wilderness areas, they state the need to *“Maintain existing opportunities for solitude by managing visitor use patterns if monitoring indicates a need.”*

Obviously, the BLM is not doing its job properly in regards to these wilderness areas or keeping their oath to the public whom they are supposed to serve.

COMMERCIAL ENTERPRISES ARE PROHIBITED

(44) The Commercial Services Needs Assessment Section 4 (c) of the Wilderness Act states that commercial enterprises are prohibited within wilderness. I contend that any nearby commercial acts that are detrimental to any wilderness areas are also prohibited, and believe there is sufficient court evidence to support that idea.

DEFIANCE OF A PRESIDENTIAL AND CONGRESSIONAL ACT

(45) A very important consideration, concerning the right of the BLM to allow the building of industrial wind turbines anywhere near a wilderness area is the discussion of who is the “*boss*” of those lands. It should be remembered that these wilderness areas came into being by a majority Congressional vote and were signed into existence by the President of the United States in February 2016. The BLM does not outrank the President or Congress. It should be recognized that the BLM works for the government, the government does not work for them. The President and Congress are their boss, not the other way around. Therefore, the BLM has absolutely no right to remove the wilderness qualifications from a land that was designated a wilderness by their governmental superiors. I believe that is a truth that would hold in any Federal court.

NEVADA’S FIRST WILDERNESS

(46) Historically, the Wee Thump Joshua Tree Wilderness is Nevada’s very first unprotected area that was congressionally deemed an official wilderness. It is logical to assume that the state’s first such wilderness is also the state’s premier wilderness area (why else would it be chosen first?), which means that it is a very special place indeed.. Along those lines, it is frightening to think that if the BLM would not hesitate to approve the despoiling and destruction of that wilderness, how much more freely would they act to destroy slightly lesser wilderness areas in Nevada if given such latitude? If they cannot be stopped from destroying our first such wilderness, what hope is there for the second, third, fourth, etc., wilderness areas?

MORE THAN JUST THE SPIRIT OF SOUTHERN NEVADA

(47) Looking at a map of the Wee Thump Joshua Tree Wilderness, one cannot help but to see that the personnel of the BLM who originally saw this wilderness come into being knew how amazing a wilderness it is, so much so that the BLM named the main hiking path through it the “*Spirit of Wilderness*” trail. It is an apt name. If something embodies not just the spirit of the region or the spirit of the desert or the spirit of the state, but embodies the very essence of the spirit of wilderness itself, it justly deserves all the protection it can get.

ECONOMICALLY UNFEASIBLE

(48) What is being proposed around the South McCullough Wilderness and Wee Thump Joshua Tree Wilderness constitutes a very bad idea, it is immoral, it is irresponsible, it is illegal, it is destructive, it is unpatriotic, and it is even economically UNFEASIBLE Preliminary calculations suggest that the cost in legal fees being levied against the Crescent Peak Renewables LLC. (AKA Eolus Vind AB), their contractors, and the BLM will not only drastically reduce any potential profits but will surely represent great financial losses to each of those organizations. Even in the absence of lawsuits, it is not a prime location for industrial wind turbines. It is highly instructive to note that at the third BLM scoping meeting, in the meeting rooms of the Santa Fe Station, Ed Duggan, a senior project manager, made the statement, *“It is not the windiest place in the country. But for this part of the country, and in particular for Southern Nevada, it’s a very unique place.”*

Moreover, there are reports that indicate that California utilities and the California Independent System Operator are not interested in buying low-quality wind from this area. They are seeking high-quality wind from the Great Plains wind resource areas such as those in Wyoming, Colorado, and New Mexico, via long transmission lines such as TransWest Express. California is having an overgeneration problem now and is looking farther afield for renewable energy.

As can be seen, it is a project that is not economically feasible in the first place, and there would be a lack of profit margin even without the serious opposition that is presently growing in numbers. Already, this extremely misguided project has opposition in the shape of 19 major organizations, thousands of concerned citizens, U.S. senators and important state representatives. It is also worth pointing out that those who support Eolus Vind AB, the Swedish company behind this looming nightmare, do so exclusively by touting the far-fetched possibility that the company will be providing 500 megawatt hours of electricity to California. The fact is that companies like Eolus Vind AB could care less about providing energy. Their goal is to take advantage of giant Federal subsidies for building industrial wind turbine facilities and then sell those facilities at a high profit margin to others. Case in point, according to Wind Power Monthly, in the financial quarter that ranged from December 1, 2017 to February 28, 2018 of this year, Eolus Vind AB profits were up by 66%, not due to selling power but by selling several of the industrial wind turbine facilities they built. Specifically, last year the company made \$281.1 million generating electricity, while in just the first quarter of this year they made \$3.88 billion selling just some of their industrial wind turbine facilities, which represents a thirteen-fold increase in profits. For Eolus Vind AB, it’s all about becoming incredibly rich by destroying Nevada’s precious natural desert resources. It is not about any energy benefits the country

would receive.

LOOMING GREATEST HUMAN HEALTH HAZARD OF ALL TIME

(49) If one were to ask the average citizen of this country, “*What was the greatest environmental human health disaster ever to occur in the United States?*” Most people would immediately answer either, “*Three Mile Island*” or “*Love Canal*.” The reality is that the most harmful environmental disaster to ever effect a sizable amount of human lives was the asbestosis poisoning of Libby, Montana (specifically, the largest incident of community-wide exposure to a toxic substance in U.S. history). That manmade vermiculite mining event, resulted in rates of fatal asbestosis that were 40 to 80 times greater than the national average and killed 10% of the town’s population. If this industrial wind turbine project is allowed to take place anywhere near the proposed construction areas, as supported by the BLM, Southern Clark County may be soon destined to surpass the health disaster of Libby, Montana. While in Libby, the mine owners were eventually acquitted of complicity and cover-up charges, this won’t be the case with Eolus Vind AB or the BLM, since they will have knowingly produced a very preventable health disaster by purposely disturbing asbestos laden soils for the Crescent Peak Wind project despite the dire geologic reports of the health cost of doing so.

Published research by Professor Brenda J. Buck of the UNLV Department of Geoscience revealed, “*We found naturally occurring fibrous actinolite, a regulated amphibole asbestos mineral, in rock, soil, and dust that can be transported by wind, water, cars, or on clothing after outdoor recreational activities. Sources of these fibrous amphiboles are several plutons in southern Nevada and Arizona and alluvial fans emanating from asbestos-containing bedrock. The morphology of the amphibole fibers is similar to amphibole fibers found in the USEPA Superfund site at Libby, MT... Because large populations in Boulder City, Henderson, and Las Vegas are located only a few kilometers, sometimes even only a few tens of meters, downwind from the sources, and because most of the particles are transported in suspension after they are emitted, potentially large populations in Boulder City, Henderson, and perhaps Las Vegas could be exposed. This study demonstrates a potential public health risk to several large population areas... Electron microprobe analysis of fibrous amphiboles (111 analyses) in rocks from Boulder City and the McCullough Range identified these amphiboles primarily as actinolite (85%), one of the six regulated asbestos minerals... In addition, the wind regime in the area is bimodal (Fig. 11), with strong south and southwest winds in spring and summer and primarily northeast winds in autumn and winter... Southeast winds are less common but do occur. Therefore, especially in the spring, the populations of*

eastern Henderson and eastern Las Vegas are located within only a few hundred meters to a few kilometers downwind from the emission sources. Given the mineralogy and morphology of these fibers, it is imperative that this problem be further studied in southern Nevada. In Libby, MT, exposure to fibrous amphiboles has resulted in asbestos-related-disease mortality rates 40 to 80 times higher than other areas in Montana and the United States... our data indicate a potential public health threat in southern Nevada. Any potential future land-use projects should carefully determine the risks to both workers and the regional populations because disturbances to these natural desert surfaces cause increased dust emissions. There is a compelling need for epidemiology studies, additional geologic and mineral studies, and significantly more research on their location, emission, airborne concentration, and pathways of human exposure.”

According to a USGS publication, “...researchers estimated that fibrous amphibole minerals could be present in the soil or bedrock covering at least 214 square kilometers around the McCullough Range, Black Hill, and in and around the towns of Boulder City and Henderson, Nevada.”

The Crescent Peak Renewables project sits squarely in the region of those 214 square kilometers. The Soil Science Society of America Journal published a study that reported the results of asbestos in 43 soil samples taken in the aforementioned areas. According to that study, “All 43 samples, including rock, soil, dust, car tire, and clothing, contained fibrous amphiboles. The original sources of these fibrous amphiboles are the Miocene plutons in the McCullough Range, Black Hill, and Boulder City areas.” That is more than scary news!

One can only imagine the billions of dollars in successful lawsuits against the BLM and Crescent Peak Renewables and their parent company Eolus Vind AB, as well as against other associates of their horrendous project. There is a very good chance that every potential human victim of their project in Las Vegas and Henderson could successfully file suit for damages and suit for potential damages in case there is any increase in asbestos related diseases such as mesothelioma in those areas. If such events should come to pass, there is no doubt that billions of dollars will be court mandated to be put in a trust for future victims of the asbestos-tainted soils that were disturbed by members of the misguided Crescent Peak Wind project. Considering that the combined populations of Las Vegas and Henderson are estimated to be approximately 926,000 (and that is not even counting the populations of Primm Valley, Jean, Goodsprings, Sloan, Searchlight, and Cal-Nev-Ari.) With nearly a million potential victims, the amount of monies in punitive judgments and criminal damages is likely to be astronomical. Atop the legal fees will also be massive fees for cleanup. For instance, in the case of Libby, Montana, the asbestos poisoning prompted the EPA to declare their first ever public health

disaster, and the costs for government cleanup afterward totaled well over a half billion dollars. Considering the high cost of cleanup where the population was only 2,628 people, the cost for cleanup in the Las Vegas valley and surrounding areas, where the population is around a million people, could potentially be 500 times higher or close to 250 billion dollars! Moreover, according to a CDC report discussed on asbestos.com, Nevada already ranks #36 in malignant mesothelioma and asbestosis diseases when compared to the other 50 states, and a concentration of those life-threatening and debilitating diseases occur in Las Vegas, Henderson, and Reno. At that rate, it wouldn't take much more exposure to asbestos to plunge southern Clark County into the record books of becoming the worst U.S. toxic substance exposure disaster of all time.

What the above information means is that while the BLM wishes to allow the Crescent Peak Wind project to proceed forward in order to generate income for their bureaucracy from leasing the land, any of the hundreds of thousands or possibly even a handful of millions of dollars they might earn will be radically dwarfed by the billions of dollars it will cost them in lawsuits and cleanup fees. If that happens under the present economy-minded administration, a lot of bureaucratic heads that supported the Crescent Peak Wind project will roll.

WHAT SHOULD BE DONE?

(50) The only logical and financially viable course for the BLM to take, concerning the proposed industrial wind turbine project is one that was wisely proposed by Alan O'Neill, former superintendent of the Lake Mead National Recreation Area. His proposal calls for the BLM to incorporate a "*no wind*" alternative into their EIS, as well as to expand the current Area of Critical Economic Concern (ACEC) to combine and connect the present ACEC with the Castle Mountains ACEC, Mojave National Preserve, Wee Thump Joshua Tree Wilderness, and the South McCullough Wilderness. By filling the gaps in between these areas, such pristine wilderness areas will be preserved for all time and that act will represent a milestone achievement on the part of the BLM that will be remembered by desert-loving American citizens, as well as by visitors from around the world, for all times. This timely issue can represent a public relations turning point for the BLM to either become the eternal villains or to at last become the heroes. Not too many bureaucracies are granted such an opportunity for lasting positive posterity in their lifetime.

CLEAN, GREEN, POLLUTION-FREE SCAM

When it comes to the pros and cons of the Crescent Peak Wind project, there are literally hundreds of cons but only one pro that is being touted: The chance to provide 500 megawatts of clean, green, pollution-free electricity to Southern California. But just how clean, green, and pollution-free are industrial wind turbines projects? The answer to that question forms the dark side of their subverted story, which corporate investors have so far been able to successfully squelch. The big selling point that wind energy projects make to an uninformed public is to compare both the air pollution that is caused by coal-fired electrical generating plants and the radioactive waste that is left in the wake of nuclear power plants to the “innocuous” smoke-free blades turning on an industrial wind turbine. Not so fast corporate PR department, you forgot to mention a few important facts about how those industrial wind turbines come into being...

Dirty coal is blamed as one of the culprits of global warming but scientific studies show that industrial wind turbine projects, on average, are 1.3 degrees Fahrenheit warmer than the surrounding landscapes that are devoid of them. What is way worse is that the building of industrial wind turbines requires a lot of burning coal. When it comes to making an industrial wind turbine, it is known that there are more than 8,000 different components that go into each one, and it has been calculated that the manufacture of an industrial wind turbine requires 200 times more raw materials than what goes into the making of a modern combined cycle gas turbine of equal energy output.

Because tons of steel (as well as cast iron) go into the making of each industrial wind turbine, it takes a tremendous amount of coal to produce that steel, not only to smelt the ore, but also to create the carbon that goes into the steel to harden it. Likewise, industrial wind turbines sit on deep concrete pads, and similar to steel, it takes tons of coal to produce enough concrete for a single industrial wind turbine. Specifically, the weight of one two-megawatt wind turbine is around 250 tons, which includes the tower, nacelle, rotor, and blades. For something that gargantuan to be built, it has been estimated that to manufacture just one of those behemoths, 150 tons of coal must be burned, and that figure doesn't include the massive amounts of coal being burned to create the coils of copper wire or the supermagnets that produce the electricity. Moreover, when speaking of coal, we're talking about a non-renewable energy source (coal) required for producing a two-megawatt industrial wind turbine, and many of the industrial wind turbines being proposed for the Crescent Peak Wind project would be 4.5 megawatt monstrosities. Now, let's talk about the production of the supermagnets that form the dirty heart and dark soul of each industrial wind turbine.

Those who tout the cleanliness of wind energy facilities over the frightening hazards of nuclear power plants forget to mention an important fact about the

byproduct of making supermagnets. An alarming statistic from a MIT study revealed that the production of supermagnets for U.S. industrial wind turbines alone required 4.9 to 6.1 million pounds of rare earth minerals to be processed in 2012 (the year of the study). That MIT study, which appeared in the Bulletin of Atomic Sciences, demonstrated that a 2 megawatt industrial wind turbine contains 752 pounds of the rare earth mineral neodymium and 130 pounds of dysprosium. Overall, the byproduct of producing those rare earth minerals creates an equal amount of radioactive waste, which means that 4.9 to 6.1 million pounds of radioactive waste were produced as a byproduct of processing neodymium and dysprosium that same year. By comparison, the amount of radioactive waste that was created by nuclear energy, in the form of spent fuel pellets, amounted to somewhere between 4.4 to 5 million pounds of waste in that same year. Since annually, more industrial wind turbines are being built and erected since the date of that study, the figures for dirty wind energy's radioactive waste grows worse each year.

Deadly radioactive byproducts are not the only toxic effluent that occurs from the production of supermagnets for industrial wind turbines. According to a study that appeared in the Chinese Society for Rare Earths, "...one ton of calcined rare earth ore generates 9,600 to 12,000 cubic meters (339,021 to 423,776 cubic feet) of waste gas containing dust concentrate, hydrofluoric acid, sulfur dioxide, and sulfuric acid, [and] approximately 75 cubic meters (2,649 cubic feet) of acidic wastewater."

Moreover, a widely circulated story from 2011 came from the U.K.'s Daily Mail newspaper, when reporter Simon Parry traveled to Baotou, China (in the region of Mongolia) for the purpose of witnessing the ecological devastation of the area where rare earth minerals are mined and processed in the People's Republic. What he saw was that where green agricultural fields used to flourish there was now a six mile wide toxic lake with not a single living green plant around it. Parry also found out that as the lake began to grow, local villagers started losing their teeth and saw to their dismay that their hair began turning white at abnormally young ages. It wasn't long until high incidents of cancer were recorded, along with very high rates of osteoporosis, plus skin and respiratory diseases, which is hardly surprising considering that the lake's radiation levels are ten times higher than the surrounding bleak countryside, and the depth of the lake - which was already 100 feet deep at the time of the report - is rising three feet per year. Throughout the city of Baotou, people have to wear face masks whenever venturing outdoors where they are forced to breath the acrid air. Such is the cost of wind energy's "clean, green, pollution-free" electricity.

So, how clean is wind energy? Compound the greenhouse gasses produced

by millions of tons of burning coal and the millions of pounds of radioactive waste products accompanied by the vast amounts of diesel fuel being burned by the ships, trains, helicopters, diesel trucks, earth-moving equipment, and company vehicles that are required to move their equipment from factories to proposed building sites, and one can quickly see that the amount of pollution created to build, transport, and erect a single industrial wind turbine is nothing short of staggering. Truly, it is a major understatement to say that wind energy is neither clean, nor green, nor is it really very effective as a means of producing electricity. Plus electrical wind turbines are a major source of light pollution where their incessant blinking red lights at night can completely destroy the natural beauty of an otherwise unblemished night sky. Even in the day, they cause light pollution through the constant flickering of sunlight and shadow through the blades, as well as the staccato bright on and off glint of the sunshine on the blades that acts like a strobe. On top of those annoyances, there is also the previously mentioned problem of noise pollution, sight pollution, electromagnetic pollution that interferes with television radio and wifi and cell phone waves, and in the case of the sites foolishly chosen by Crescent Peak Renewables, a huge amount of potentially deadly pollution in the form of asbestos dust.

A LOT OF HULLABALOO ABOUT WIND ENERGY

Ask the average person, who has been bombarded by wind energy propaganda, about the benefits of wind energy, and they are likely to repeat the misconception that industrial wind turbines represent the most efficient means of producing electricity. Wrong. Actually, very wrong. Present-day industrial wind turbines can only convert 59% of the wind's energy to electricity, and a lot of the energy that is captured goes to waste. It is important to realize that wind-generated electricity is highly sporadic and subject to severe production fluctuations and usage.

On the other hand, there is enough statistical information on peak energy and low energy times of consumption by consumers that it is widely known when power providers need to turn up the juice or turn it down. Planning for those peak electricity consumption times is not something that industrial wind turbine operators can do. Instead, industrial wind turbines are subject to the whims of the wind, so if they are producing maximum electricity during low consumption periods, they are sending electricity out into the ether where it simply disappears. In other words, industrial wind turbines can produce electricity but they cannot regulate energy or store it up to ration out during periods of maximum need. Instead, they make electricity whether it is being used or not, and many times the

electricity they produce is wasted and therefore it is not paid for. So when wind energy companies tout the advantage of industrial wind turbines over photovoltaic solar panels by repeating their endless mantra about wind energy being able to produce electricity all night, it should be kept in mind that energy usage by consumers is at its lowest during the night, which means that much of the energy produced by industrial wind turbines at night is never used.

In closing, it is worth mentioning how ironic it is that the name of the subsidiary of Eolus Wind AB, which seeks to destroy our premier desert wilderness areas (official and unofficial wilderness areas) goes by the title of Crescent Peak Renewables. LLC. It is an ironic name because if such a project is allowed to wreak the havoc they seek to inflict on the desert, there will be nothing renewable about the devastation they leave in their wake. To end this letter of opposition on a positive tone, there is probably no better way than to kindly share my favorite wilderness quote:

“The wilderness and the idea of wilderness is one of the permanent homes of the human spirit.” - Joseph Wood Krutch

Respectfully submitted,
Dr. Donald Allen Deever
P.O. Box 8
Searchlight, NV 89046
deeverd@unlv.nevada.edu
(702) 375-6929