



VIA FEDERAL EXPRESS OVERNIGHT DELIVERY AND EMAIL

August 23, 2012

Director (210)
Attention: Brenda-Hudgens Williams
20 M Street, S.E., Room 2431LM
Washington, D.C. 20003
Brenda_Hudgens-Williams@blm.gov

**Re: Protest of Proposed BLM Resource Management Plan (RMP) Amendments
in the Solar Energy Development Program for Six Southwestern States**

Dear Director:

This Resource Management Plan Protest is submitted on behalf of the Center for Biological Diversity (“Center”) regarding Proposed BLM Resource Management Plan (RMP) Amendments in the Solar Energy Development Program for Six Southwestern States and Final Programmatic Environmental Impact Statement (“Final PEIS”). The Notice of Availability of the proposed plan amendments and Final PEIS by the Bureau of Land Management (“BLM”) was published in the Federal Register on July 27, 2012 (77 Fed. Reg. 44267), and the EPA notice was also published on the same day (77 Fed. Reg. 44234). This Protest is being timely filed in accordance with 43 C.F.R § 1601.5-2.

INTRODUCTION

The development of renewable energy is a critical component of efforts to reduce greenhouse gas emissions, avoid the worst consequences of global warming, and to assist the country in achieving emission reductions including specific requirements set by state renewable energy goals. The Center strongly supports the development of renewable energy production, and the generation of electricity from solar power, in particular. However, like any projects, proposed solar power projects should be thoughtfully planned to minimize impacts to the environment. In particular, renewable energy projects should avoid impacts to sensitive species and habitats, and should be sited in proximity to the areas of electricity end-use in order to reduce the need for extensive new transmission corridors and lines and the efficiency loss associated with extended energy transmission. Only by maintaining the highest environmental standards with regard to local impacts, and effects on species and habitat, can renewable energy production be truly sustainable.

The Center strongly supports thoughtful planning for implementing solar technologies on public lands and appreciates the efforts that the BLM has made to date towards that goal. The Proposed Plan Amendments and Final Programmatic Environmental Impact Statement (FPEIS) are a step in the right direction by putting some sensitive lands off limits to industrial scale development and providing for a process to develop consistent mitigation and monitoring of site-specific development on the public lands. Unfortunately, however, the BLM's preferred alternative will fail to achieve many of the benefits of the planning process because the preferred alternative provides overly an overly expansive "variance" process including for potential development, areas that are inappropriate for development and/or have not been sufficiently studied. Moreover, both the preferred alternative and the solar zone alternative provide too broad an exception for the so-called "pending" or "existing applications" sited outside of the solar energy zones (SEZ) or variance areas and the FPEIS unfortunately fails rely on the level of detailed information and analysis needed for this critical planning effort. As we have urged the BLM throughout the process, there is a critical need to move swiftly to adopt a policy where all utility scale solar development on public lands managed by the BLM occurs in areas expressly zoned for this industrial use. The Center understands that in the future additional SEZs for solar development on public lands may be needed and supports inclusion of the process to identify new SEZ in the future. However, the Center protests the inclusion extensive exceptions that allow the continued siting of solar projects on public lands outside of SEZ both by adopting the broad "variance" exceptions and by adopting an overly-inclusive list of "pending applications". Together these exceptions to siting within the SEZs will overshadow the benefits of the planning process and designation of the SEZs and lead to unnecessary and undue degradation of our public lands. As a result, if the BLM's preferred alternative is adopted it will continue to allow industrial sites to sprawl across the southwestern deserts outside of the designated SEZs and in habitat that should be protected to achieve the conservation and other goals for protecting our public lands as a whole will be lost.

The Center urges the BLM to: adopt the solar energy zone program alternative, providing for SEZs without the variance areas and process; and urges the BLM to limit the "pending applications" that will not be subject to the plan amendments to those projects that already had already begun their required NEPA review, with a scoping notice/notice of intent having been published in the Federal Register, by the date that the Notice of Intent was published for the Solar PEIS, May 29, 2008 (73 Fed. Reg. 30908). To do otherwise would essentially retain the helter-skelter approach that has resulted in applications and solar energy projects sprawling over public lands destroying and fragmenting habitats including places that are essential for rare and imperiled species as well as impacting other fragile resources that should be conserved. Further, we are submitting a list of specific areas with known high biological diversity values that are within variance areas with the request that they be designated as exclusion areas.

In addition, the Center protests the proposed plan amendments because in preparing the FPEIS the BLM failed to gather and analyze adequate information on the resources that may be affected in the planning areas to meet the most basic NEPA requirements. The lack of adequate data and analysis is especially of concern to the Center because of the impacts of the program and the plan amendments on rare and imperiled species, their habitats, and other irreplaceable desert resources including soil and water.

PROTEST

1. Protesting Party: Contact Information and Interests:

This Protest is filed on behalf of the Center for Biological Diversity, its board, staff, and members by:

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The Center's interests in the Proposed plan amendments and the Solar Development PEIS are detailed in our comments which include: scoping comments submitted July 15, 2008¹, additional scoping comments on maps and additional information on September 14, 2009 (with attachments and references) and comments on the Draft Programmatic Environmental Impact Statement (DEIS) regarding both general issues and specific issue in Nevada (as part of a group letter dated April 18, 2011) and regarding both general issues and specific issues in California by letter dated May 2, 2011; and comments on the Supplemental Programmatic DEIS on January 27, 2012 (with attached references). All of the comments and references submitted by the Center are incorporated herein by reference. The Center fully participated in the public process for developing the PEIS and has been and continues to be an active participant in the public process for siting solar projects in the affected states, particularly focused on California and Nevada.

The Center is a non-profit environmental organization with more than 375,000 members and online activists, including many members who live and recreate in California. The Center uses science, policy and law to advocate for the conservation and recovery of species on the brink of extinction and the habitats they need to survive. The Center has and continues to actively advocate for increased protections for species and habitats in the Southwestern deserts on lands managed by the BLM. The lands that will be affected by the decision include habitat for many listed, rare, and imperiled species that the Center has worked to protect including the threatened desert tortoise, the Mojave fringe-toed lizard, flat-tailed horned lizard, desert kit fox, golden and bald eagles, California condor, Lane Mountain milkvetch, white margined penstemon, and many other species which will be affected by the proposed development. The Center's board, staff, and members use the lands and waters within the planning area, including the lands and waters that would be affected by the proposed development, for quiet recreation (including hiking and camping), scientific research, aesthetic pursuits, and spiritual renewal.

¹ The Center believes that BLM has copies of the two references cited in the scoping comments but out of an abundance of caution is submitting additional copies with this protest. The reference to the drought monitor has changed to <http://droughtmonitor.unl.edu/>. As BLM is aware, drought persists this year in the six southwestern states and elsewhere.

The Center has been actively involved in efforts to limit greenhouse gas emissions and supports the development of renewable energy including solar power as a critical component of those efforts. However, like any projects, siting of utility scale solar power projects on public lands should be thoughtfully planned to minimize impacts to the environment. As the Center has stressed throughout this process, renewable energy projects should avoid impacts to sensitive species and habitat, and should be sited in proximity to the areas of electricity end-use in order to reduce the need for extensive new transmission corridors and the efficiency loss associated with extended energy transmission. Only by maintaining the highest environmental standards with regard to local impacts, and effects on species and habitat, can renewable energy production be truly sustainable.

The Center's interests also include interests in science-based conservation planning on BLM lands and other lands. To that end, the Center is a stakeholder participant in the Desert Renewable Energy Conservation Plan process, where appropriate siting of renewable energy projects in the California deserts is a key focus. In addition, as the BLM is well aware, the Center has been actively involved in the planning process for earlier amendments to the CDCA Plan for site-specific renewable energy projects and as well as regarding solar and wind project proposals in Nevada and elsewhere. In particular, the Center has advocated for increased protections for the desert tortoise and other rare desert species that live in these fragile lands from threats due to grazing, off-road vehicle use, mining and other development.

The Center is concerned that the environmental review pursuant to NEPA, the FLPMA compliance, and the ESA compliance for the proposed program lacks the needed detail that should have been provided in the required inventory of the resources of these public lands to support the planning effort.

2. & 3. Issues Being Protested and Parts of the Plan Amendment Protested:

The Center protests the proposed adoption of the BLM's preferred alternative which provides for extensive variance lands and an overly inclusive list of so-called "pending applications." The preferred alternative would allow industrial-scale solar power plants to be built on public lands that are inappropriate for such development. The bases for this protest are that the decision to adopt the BLM's preferred alternative and the plan amendments therein: is not consistent with other existing planning including the California Desert Conservation Area plan; is not consistent with FLMMPA; is not based on adequate environmental review as required by NEPA; and the decision to adopt the plan amendment is not consistent with BLM's policies regarding conservation and planning to protect habitat for imperiled species.

4. The Center Submitted Many Documents That Support This Protest

The Center submitted comments and supporting documents throughout the administrative process for the solar PEIS planning process. Specifically the following: scoping comments submitted July 15, 2008, additional scoping comments on maps and additional information on September 14, 2009 (with attachments and references) and comments on the Draft Programmatic Environmental Impact Statement (DEIS) regarding both general issues and specific issue in Nevada (as part of a group letter dated April 18, 2011) and regarding both general issues and

specific issues in California by letter dated May 2, 2011; and comments on the supplemental Programmatic DEIS on January 27, 2012 (with attached references). All of the comments and references submitted by the Center are incorporated herein by reference.

5: Why the Proposed Decision to Adopt the BLM's Preferred Alternative is Wrong:

As noted above, the Center has provided detailed comments showing that the decision to adopt the preferred decision is wrong because it is inconsistent with good planning principles and BLM has not undertaken adequate environmental review. A concise statement of those reasons is provided below.

- The preferred alternative's inclusion of extensive variance lands is not consistent with the bioregional planning approach in the CDCA Plan. The overarching principles expressed in the Decision Criteria in the CDCA include minimizing the number of separate rights-of-way and "avoid[ing] sensitive resources wherever possible." CDCA Plan at 93. The preferred alternative which includes extensive variance lands in the CDCA planning area in California does not meet these criteria and, rather, will undermine these critical goals. While the zone alternative attempts to meet these criteria, the over-inclusion of so-called "pending applications" also undermines these goals. For example, the exclusion areas include the Ivanpah Valley in both California and Nevada but then the pending applications list allows for extensive additional development projects in that area to go forward—undermining the value of this exclusion.
- The preferred alternative is not consistent with FLPMA which requires BLM to prevent unnecessary or undue degradation of public lands. 43 U.S.C § 1732(b). The BLM has failed to show that it is necessary to include extensive variance lands in the program from the outset or that reliance on the process to develop additional SEZ would not be adequate to achieve any needed flexibility or expansion of SEZ.
- The BLM has also failed to show that the exceptions that would allow the so-called "pending applications" to move forward in the approval process will not cause unnecessary and undue degradation of public lands and resources. Indeed, several of those projects are in particularly sensitive areas and BLM should have used the planning process to steer that development to more appropriate places. The Center also protests that the list was changed and expanded significantly during the planning process – shockingly, by the Final PEIS 11 new applications were added to the list that were not included on the list in either the Draft PEIS and Supplemental Draft PEIS:

In California,

- CACA 050390 Solar Reserve (Mule Mountain III)
- CACA 051967 BrightSource Energy (Sonoran West SEGS)
- CACA 052130 Ridgeline Energy (Indio Solar Project)
- CACA 053138 BrightSource Energy (Rio Mesa Solar)
- CACA 053143 Dixieland Solar Farm, LLC (Dixieland Solar)

In Nevada,

- NVN 086782 Southwest Solar Land Company
- NVN 087366 Solar Millennium, LLC

- NVN 087756 Solar Millennium, LLC
- NVN 090360 Hidden Hills Solar
- NVN 090476 BrightSource Energy
- NVN 090788 Boulevard Assoc. (Sandy Valley Solar)

The BLM has provided inadequate rationale for expanding the list of so-called “pending applications” to applications filed long after the PEIS scoping was published and even after the initial maps and/or the Draft PEIS was available which provided notice of the proposed plan changes. Indeed, it appears that the expansion of the so-called “pending applications” concept may have spurred some developers to make many additional applications outside of the proposed SEZs in order to take advantage of this overly broad exception to the planning process. Notably, no explanation is given for the inclusion of additional applications filed by Solar Millennium as “pending” given that there is not even an active company at this time.

- The proposed decision also appears to assume that BLM will extend the “pending applications” exception to new projects on sites where other projects were permitted but never built and are now re-proposed by a different applicant years after this PEIS planning process was begun. Taken as a whole, the BLM proposal fails to support the findings that underlay the planning process itself - that planned development will avoid many significant impacts to public lands resources. The BLM proposal to include “existing applications” sprawling across the landscape simply does not avoid many significant impacts. This is particularly egregious for poorly sited projects such as the former Calico project in California – any new proposals at this site, or other sites where development was approved but never undertaken, should stand on equal footing with other new proposals.

- The inclusion of the extensive variance lands and the exception for so-called “pending applications” is not consistent with FLPMA’s planning provisions which require that in developing and revising land use plans, the BLM consider many factors and “use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences . . . consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for realization of those values.” 43 U.S.C. § 1712(c). It is also inconsistent with the FLPMA provisions which contemplate that BLM will prepare and maintain adequate inventory data on the resources of an area and that information be used to inform the planning process. 43 U.S.C. § 1711(a); 43 U.S.C. § 1701(a)(2).

- The Center also protests the inclusion of designated Wildlife Habitat Management Areas (WHMA) in the solar energy zones given that BLM has already determined that these areas should be protected to meet long-term conservation goals.

- The Center protests the inclusion of the following areas in Nevada in the variance areas due to resource conflicts:

- Stewart Valley and Pahrump Valley, Township 21 South and north. The prevalence of rare plants in this area make it inappropriate for development. Pahrump Valley buckwheat (NV BLM sensitive species); Parish phacelia (NV BLM sensitive species); Death Valley sage (NatureServe 1); Reveal’s

(Amargosa) buckwheat (NatureServe 1); Catclaw and acacia woodlands and associated species. In addition the area contains desert tortoise habitat and there are significant ground water concerns.

- Oasis Valley: Potential impacts to Amargosa toad habitat and groundwater concerns make this an inappropriate area for development.
 - Spring Valley and Lake Valleys: Development in this area would cause impacts to sage grouse and cumulative impacts to sage grouse and other sage brush dependent species from the Spring Valley Wind Project and the proposed Southern Nevada Water Authority Ground Water Development Project make this an inappropriate area for development.
 - Newark Valley, South of Rt 50: impacts to critical sage grouse habitat make this area inappropriate for development
 - Hidden Valley and Jean Dry Lake Valley: This area includes desert tortoise habitat and connectivity corridors and development would also cause cumulative impacts to tortoise from transmission. Development of industrial scale solar projects would also cause impacts to irreplaceable white-margin penstemon (NV BLM sensitive species) habitat.
 - Mormon Mesa: This area includes important desert tortoise habitat and development would also impact sticky buckwheat habitat (NV BLM sensitive species) and red-tailed blazing star bee (NV BLM sensitive species) habitat. There are also groundwater concerns with development of this area.
 - Upper Las Vegas Wash: This area is inappropriate for development and much of it is being considered for national monument designation. There are many sensitive biological resources that should be preserved in this area including: Las Vegas bearpoppy (State “Critically Endangered”) habitat; Las Vegas buckwheat (BLM sensitive species) habitat; Desert tortoise; red-tailed blazing star bee (BLM sensitive species) habitat.
- The Center protests the inclusion of the following areas in California in the variance areas due to resource conflicts:
 - Pahrump Valley and Mesquite Valley Areas – This area is inappropriate for development because it includes good desert tortoise modeled habitat as by USGS², provides key connectivity between adjacent ranges for a suite of species including desert bighorn and desert golden eagle foraging habitat. There are also significant issues regarding groundwater overdraft (Pahrump aquifer is already in overdraft).

² Report, habitat model, and data layers are available at <http://pubs.usgs.gov/of/2009/1102/>

- Silurian Valley/Baker Areas – This area is inappropriate for development because it contains key Mojave fringe-toed lizard habitat, the Baker Sink linkage between Death Valley National Park and the Mojave National Preserve, USFWS-identified Superior-Cronese linkage corridor for desert tortoise, and is directly adjacent to the Mojave National Preserve. There are also significant water issues pertaining to the Amargosa River and Death Valley National Park.
- Cronese Lakes Area - This area is inappropriate for development because it includes USFWS-identified Superior-Cronese linkage corridor for desert tortoise; key linkage between the Mojave National Preserve and the Superior-Cronese Desert Wildlife Management Area for numerous species, the terminus of the Mojave River, and the Mojave Sink Desert Willow Unusual Plant Assemblage (UPA) as identified by the CDCA Plan which should be protected.
- Needles Area - This area is inappropriate for development because it overlaps the Wildlife Habitat Management Area (WHMA) as designated in NECO, includes the Mesquite Thicket UPA as identified by the CDCA Plan, occurs along the Colorado River section of the Pacific flyway for migratory birds, and has significant water issues related to the Colorado River.
- Amboy Area - This area is inappropriate for development because includes a Desert Bighorn WHMA, key connectivity area between the Mojave National Preserve and Joshua Tree National Park, known insect diversity hotspot, and is directly adjacent to the proposed Desert Trails National Monument.
- Ludlow Area - This area is inappropriate for development because it includes good desert tortoise modeled habitat by USGS, includes USFWS-identified least cost linkage corridor for desert tortoise; includes a Crucifixion Thorn UPA as identified by the CDCA Plan, is directly adjacent to the proposed Desert Trails National Monument, and the northern part of the area is sandwiched in between the Bristol Mountains and Kelso Dunes wilderness areas.
- Owens Lake Area - This area is inappropriate for development because it includes the Olancha Greasewood UPA as identified by the CDCA Plan, could exacerbate dust and water issues associated with Owens Lake, Owens Lake is also an Important Bird Area and a key migration corridor along the Pacific Flyway.
- Granite Mountains south of Barstow - This area is inappropriate for development because it includes key connectivity for desert bighorn; good desert tortoise modeled habitat by USGS,
- South of Highway 247 - This area is inappropriate for development because it includes good desert tortoise modeled habitat by USGS, includes USFWS-identified least cost linkage corridor for desert tortoise and includes the Creosote Bush Clones UPA as identified by the CDCA Plan

- 29 Palms MCAGCC/Joshua Tree National Park Area - This area is inappropriate for development because it includes good desert tortoise modeled habitat by USGS, includes USFWS-identified least cost linkage corridor for desert tortoise, is a key linkage between Joshua Tree National Park, 29 Palms MCAGCC, wilderness and the proposed Mojave Trails National Monument. The Center understands that this area is also a key acquisition area for buffers for 29 Palms MCAGCC.
 - Parker/Vidal Area - This area is inappropriate for development because it overlaps a WHMA for multiple species and a WHMA for desert bighorn sheep as designated in NECO, includes the Mesquite Thicket UPA as identified by the CDCA Plan; includes good desert tortoise modeled habitat by USGS especially around the boundaries of the adjacent four wilderness areas, occurs along the Colorado River section of the Pacific flyway for migratory birds, contains an identified insect hotspot, and has significant water issues related to the Colorado River.
 - Palo Verde Valley Area - This area is inappropriate for development because it overlaps a WHMA for multiple species, WHMAs for desert bighorn sheep and connectivity corridors for desert bighorn sheep as designated in NECO, very near the Cibola National Wildlife Refuge; includes occupied desert tortoise habitat, directly adjacent to wilderness areas, occurs along the Colorado River section of the Pacific flyway for migratory birds, water issues related to the Colorado River.
 - Algodones Dunes Area – This area is inappropriate for development because it includes habitat for the flat-tailed horned lizard, contains three Important Bird Areas, two UPAs (the Mesquite Thicket UPA, and the Chocolate Mountains All-thorn UPA), a Management Area between the Algodones Dunes and the Cargo Muchaco Mountains, WHMAs for desert bighorn sheep, and has significant water issues.
 - Newberry Springs area- This area is inappropriate for development because it contains least cost corridors for DT between Ord/Rodman DWMA, Mojave National Preserve, and the Superior Cronese DWMA and has significant water concerns
 - California City area- This area is inappropriate for development because it includes USGS-identified good desert tortoise habitat and the Mojave Saltbush UPA.
- The inadequacies in the environmental review for the project required by NEPA include, but are not limited, to the following:

- The EIS provides inadequate NEPA review to support inclusion of WHMAs in the SEZ areas. While these areas may possibly be protected as part of review of site-specific development, they should be excluded from the outset.
- In nearly all of the variance areas there is far too little information for adequate NEPA review. For example, very little scientific information is available for the area around Vidal/Parker – it is an under-surveyed area due to its remoteness and rugged terrain. Yet large swaths of this landscape are proposed as variance lands despite extremely limited resource inventories. This scenario sets the stage for significant environmental conflicts to arise between biological (and cultural) resources and any proposed projects – exactly what good planning should avoid. .
- Due to the BLM’s ongoing and chronic failure to prepare and maintain an inventory of the affected public land resources, BLM also failed to adequately address the resources of the area in reviewing the solar PEIS. *See Center for Biological Diversity v. Bureau of Land Management*, 422 F.Supp.2d 1115, 1166-67 (N.D. Cal. 2006) (discussing need for BLM to take into account known resources in making management decisions); *ONDA v. Rasmussen*, 451 F.Supp. 2d 1202, 1212-13 (D. Or. 2006) (finding that BLM did not take a hard look under NEPA by relying on outdated inventories and such reliance was inconsistent with BLM’s statutory obligations to engage in a continuing inventory under FLPMA).
- Failing to adequately describe the baseline condition of the environmental resources of these areas.
- Failing to adequately identify and analyze the likely impacts to listed and special status species from the development that will be supported by the preferred alternative, particularly in the variance areas.
- Failing to adequately assess the impacts to soils, including the loss of intact cryptobiotic soil crusts and other stable soils throughout the planning area and failing to adequately address specialized soils such as sand dunes and the impacts to sand sources and sand transport.
- Failing to adequately address impacts to air quality particularly regarding any additional PM10 emissions in the southwestern states which include many impaired air basins.
- Failing to adequately address direct, indirect, and cumulative impacts to surface and groundwater resources in the planning area particularly from solar thermal technologies that use substantial amounts of water.
- Failing to adequately address cumulative impacts for the preferred alternative on all sensitive resources including plants and wildlife habitat particularly regarding the inclusion of the extensive variance lands.

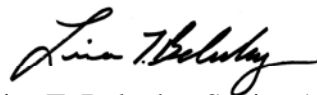
- Failing to adequately address the impacts to surface waters from the loss of natural washes and other features as well as increased erosion throughout the planning area. This is particularly critical in that the failure to address this issue on a site-specific basis for at least one project in the East Riverside SEZ lead to flooding of the site. While all of the impacts of that event on the Genesis site have not yet been studied, a review of some [materials available on the California Energy Commission website](#) clearly show that the grading on the site of this poorly-planned and sited project has most certainly caused extensive damage to soils down gradient.
- Failing to adequately address impacts to groundwater resources of these federal lands and federal reserved water rights.
- Failing to adequately identify and analyze impacts to migratory birds, golden eagles and other avian species from development due to loss of forage, impacts to corridors and flyways, and impacts from solar thermal power tower technologies.

CONCLUSION

As detailed above in this protest and in the many comments submitted by the Center to the BLM during the planning process for the solar program and PEIS, the BLM's preferred alternative should not be adopted because the environmental review to date is inadequate and incomplete and the preferred alternative is inconsistent with FLPMA and other policies, laws, and regulations including the CDCA Plan and other bioregional planning efforts. Therefore, the Center protests the adoption of the decision for BLM's preferred alternative for Solar Energy Development in Six Southwestern States.

The Center is, however, interested in engaging in a protest resolution procedure such as a protest resolution meeting with the BLM Director in order to attempt to resolve these issues. Therefore, the Center requests that the BLM Director consider whether discussion and negotiations may lead to resolution of one or more of the issues identified above and agree to hold a protest resolution meeting as promptly as possible. Please do not hesitate to contact me if you have any questions or to schedule a protest resolution meeting.

Sincerely,



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Attachments: (references cited in scoping comments)

Dregne, H.E. 1986. Desertification of Arid Lands. In *Physics of desertification*, ed. F. El-Baz and M. H. A. Hassan. Dordrecht, The Netherlands: Martinus, Nijhoff.
<http://www.ciesin.org/docs/002-193/002-193.html>

Wohlfahrt, G., L. F. Fenstermaker and J. A. Arone III 2008. Large annual net ecosystem CO₂ uptake of a Mojave Desert ecosystem. *Global Change Biology* 14: 1475–1487.