1	NOTE: CORRECTIONS HAVE BEEN MADE TO TEXT IN THE STATEMENT
2	OF IAN BLACK (PAGE 11), AND THIS CORRECTED TRANSCRIPT WAS
3	POSTED TO THE PUBLIC WEBSITE ON APRIL6 2011, REPLACING THE
4	VERSION POSTED MARCH 24. THE CORRECTIONS ARE VISIBLE IN THE TEXT
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5	UNITED STATES DEPARTMENT OF ENERGY AND BUREAU
7	OF LAND MANAGEMENT
8	SOLAR ENERGY DEVELOPMENT
9	PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT
10	(PEIS)
11	PUBLIC SCOPING MEETING
12	
13	TUESDAY, MARCH 1, 2011
14	PHOENIX, ARIZONA
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APPEARANCES 2 LINDA J. RESSEGUIE 3 Bureau of Land Management 5 JULIE DECKER 6 Bureau of Land Management 8 JANE SUMMERSON 9 US Department of Energy 11 HEIDI M. HARTMANN 12 Argonne National Laboratory

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- 1 PROCEEDINGS
- 2 PHOENIX, ARIZONA, TUESDAY, MARCH 1, 2011
- 3 7:42 P.M.
- 4 MR. DAHL: And I already have the documents.
- 5 Hi, I'm Kevin Dahl. I'm the Arizona program
- 6 manager for National Parks Conservation Association.
- 7 For 90 years, we've been the leading voice nonprofit
- 8 organization advocating for the National Parks system,
- 9 a sister organization of the fine organization, the
- 10 Bureau of Land Management. And thank you, kudos. And,
- 11 to the Department of Energy, great job. Proactive on
- 12 the solar; that's exactly what we need.
- 13 It would be great for us to find the most
- 14 suitable lands to develop as quickly as possible. And
- 15 those would be the ones that -- that have the least
- 16 possible conflict, because conflict means conflict and
- 17 lawsuits and more expense. And so the idea of these
- 18 solar energy zones are fantastic. Don't understand why
- 19 that's not the preferred choice.
- There are a few minor problems in California
- 21 and Nevada. In Arizona the three ones that have been
- 22 selected look great from a National Parks standpoint.
- 23 The detail of the work that went into them is so
- 24 incredible. For example, Gillespie, apparently, the
- 25 only impact to any of the National Parks units in

- 1 Arizona would be an occasional walker on the De Anza
- 2 National Historic Trail might see a glimpse of the
- 3 panels if the sun is exactly right, it seems like to
- 4 me.
- 5 If -- if these areas don't provide enough,
- 6 perhaps in combination with the other projects the
- 7 Arizona BLM is doing, there might be some other
- 8 degraded lands that would be appropriate. But 22
- 9 million acres on the solar development? That's --
- 10 that's way too coarse of an exclusion. It'll be a
- 11 free-for-all, finding the best locations on those 22
- 12 million acres.
- For example, in Arizona, that includes all of
- 14 the Arizona Strip, up to and adjacent to the Grand
- 15 Canyon National Park. It includes the House Rock
- 16 Valley. It's beautiful there. So many people
- 17 traveling within Arizona just love those open spaces,
- 18 and I think that's inappropriate for industrial
- 19 development.
- If you go down that route, we have to have
- 21 some refinement. There is just way too many areas that
- 22 are inappropriate.
- From a National Parks standpoint, we were
- 24 thinking there should be maybe at least a 15-mile
- 25 buffer. But, when we're talking about the Grand Canyon

- 1 and Petrified Forest, where the vistas are larger,
- 2 large and vast, that perhaps the best thing would be
- 3 to, in each case, consult with the local supervising
- 4 land manager, which is probably what you should do with
- 5 the -- all the exclusion areas.
- 6 I noticed Ironwood Forest National Monument
- 7 is appropriately excluded. But there's a section to
- 8 the west of it that would be part of the developable
- 9 land. So the development would have to go through your
- 10 monument to -- to service those. There's no other
- 11 access, except perhaps in the Tohono O'odham nation.
- 12 So, again, it -- it seems like the preferred
- 13 alternative is -- is not the best. But your solar
- 14 energy zones are a great way to go.
- 15 Also, you know, we really need to start doing
- 16 a better job of consulting with Native American
- 17 nations. You know, all legal compliance for these
- 18 developments must occur, and we should be thoughtful
- 19 about building relationships that help build trust with
- 20 our first Americans rather than compromise the little
- 21 trust we have. And that includes -- you know, perhaps
- 22 cooperative projects on tribal lands is appropriate.
- 23 Thank you for this opportunity to speak. Go solar.
- MR. MULLANY: Hello, everyone. I'd like to
- 25 thank you all for the opportunity of speaking here

- 1 today. My name is Hugh Mullany. I'm representing
- 2 Lumcloon Energy, which is -- it's an Irish company with
- 3 its offices in Tullamore. And we have an interest in
- 4 developing some sort of utility-scale sort of project.
- 5 That's why we're here today.
- 6 The fact that we are a generation development
- 7 company, we do some solar tech research, as well. And
- 8 we do some projects, which, for example -- in
- 9 collaboration with Tybee. If Tybee would have
- 10 developed wind following gap plants in Ireland, for
- 11 instance. And we're also -- In terms of our solar
- 12 research, we're specifically looking at air-cooled
- 13 condensing, improving the -- the efficiency of the
- 14 actions we choose for water use for plant technology.
- Really, why we're here today is primarily to
- 16 listen and learn and just to introduce ourselves. We
- 17 understand that this is the start of a process, working
- 18 with the communities here, that there will be further -
- 19 after the lands have been identified and the
- 20 appropriate application process, there will be further
- 21 processes in introducing ourselves to the community. So
- 22 it's just important that we just make our faces known
- 23 and just say hello to everybody.
- What Arizona is, in particular, is central
- 25 access in terms of the solar community. And, as well

- 1 as that, we also -- we would commend the focus of this
- 2 -- this process, as well. The more refined and the
- 3 tighter you get the process, the less issues that there
- 4 are with community interaction later on. When you open
- 5 it up very wide, it becomes quite difficult to manage
- 6 that process, as we find in our own experience in
- 7 generation development in the past, as well.
- 8 So, just very broadly, we'd just like to
- 9 commend the process that allows the U.S. organizations
- 10 and citizens to -- to decide the appropriate use, use
- 11 of their own land. And, really, from that point on,
- 12 it's our job then, once the land is identified, to come
- 13 up with the right technology at the right price with
- 14 the right investment for Arizona thereafter. That's
- 15 really all we have to say, and just to say thank you
- 16 again. Thank you.
- 17 MR. VENABLE: Hi. I'm Gil Venable. I'm a
- 18 former assistant dean of the ASU College of Law, and I
- 19 currently serve as the environmental justice chair for
- 20 the Palo Verde group of the Sierra Club. These are my
- 21 own comments and do not necessarily reflect the views
- 22 of ASU or the Sierra Club.
- 23 Generally, the idea of siting solar projects
- 24 on BLM land in Southwestern Arizona is a good one.
- 25 Solar energy development is a big part of the solution

- 1 to the challenge of global climate disruption and
- 2 replacing our dependence on foreign fossil fuels.
- 3 The key is in the details. I commend the
- 4 Bureau of Land Management for its decision not to process
- 5 applications for development on lands within the
- 6 National Landscape Conservation System, wilderness
- 7 areas, or inside the areas of national monuments,
- 8 national conservation areas, as well as scenic views,
- 9 national historic and scenic trails, and
- 10 environmentally sensitive lands, including those
- 11 managed by our counties.
- 12 I would encourage the Department of Energy to
- 13 adopt a similar criteria.
- Now, I would also encourage both agencies to
- 15 extend this policy, not only to the actual lands --
- 16 protected category of lands -- but to visual impacts
- 17 from these sensitive lands. I would also encourage the
- 18 addition of another category of land in that, that
- 19 protected list, in that, in -- in our desert areas;
- 20 it's the riparian areas. They have such value for
- 21 birds and mammals and are so rare that riparian areas
- 22 should not be utilized for solar projects.
- 23 The -- In -- in Arizona the key wildlife
- 24 corridors have been studied by the Arizona Game and
- 25 Fish Department and others and mapped out, so that we

- 1 know of areas which are our key corridors for wildlife.
- 2 These corridors should not be blocked by solar
- 3 projects.
- Obviously, habitats for endangered species
- 5 should be avoided and protected. But we should also
- 6 consider the ordinary species of the desert in these
- 7 projects. Rather than going in and just scraping the
- 8 land bare, the solar facilities should be mounted on
- 9 the natural terrain, so that the natural wildlife,
- 10 including reptiles and birds and mammals, are able to
- 11 remain in the area without being disturbed.
- Design should take into account the eventual
- 13 replacement or disassembly at the end of the project's
- 14 life, so that the desert is restored to its natural
- 15 condition when the project is no longer needed. There
- 16 should be a bond posted for that purpose, just as in
- 17 mining projects.
- 18 Generally speaking, solar facilities should
- 19 parallel existing transmission line corridors.
- 20 Obviously, you have to get the energy in. And in those
- 21 areas there's already been a visual disturbance by the
- 22 transmission lines.
- We should not go on the assumption that BLM
- 24 lands need to be used for solar projects. We should be
- 25 looking at the broader picture and considering private

- 1 lands, as well, particularly lands that are already
- 2 grossly disturbed, such as abandoned mining sites and -
- 3 and areas where agriculture was attempted but failed
- 4 and the land is already disturbed.
- 5 The proposal is an exciting one, and I look
- 6 forward to seeing solar facilities as they're developed
- 7 in Southwestern Arizona. Thank you.
- 8 MR. BLACK: Good evening. I represent enXco
- 9 Development Corporation. We're a leader in solar and
- 10 wind throughout the Southwest and across the country.
- This document is 11,000 pages; I can attest
- 12 to that. Me and two of my colleagues have read much of
- 13 this document in the last month.
- And, based on that, we have several discrete
- 15 issues we'd like the BLM to focus on, some issues of
- 16 concern: First is visual resource management
- 17 restrictions; second is -- are desert wash
- 18 restrictions; and, finally, the co-location policies.
- 19 In terms of visual resource management
- 20 limitations within the SEZ's, we believe these are too
- 21 restrictive. They fail to balance with the EOI and
- 22 national solar energy priorities.
- 23 Specifically, with the draft PEIS, 20 percent
- 24 of all SEZ's would be off limits as a -- off limits as
- 25 a result of class-two BLM designations recommended to

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- 1 mitigate potential initiatives. Another 12 percent
- 2 would be subject to class-three designations, which
- 3 would have a similarly restrictive effect on the
- 4 achilles heel of solar panel.
- 5 This is most apparent with regards to the
- 6 largest of the 24 SEZ's, the Riverside East SEZ.
- 7 Class-two BLM restrictions will prohibit development of
- 8 over 40 percent of the SEZ. Another 10 percent would
- 9 be subject to class-three designation.
- BLM guidelines provides that VRM classes must
- 11 balance visual resource inventory values with land-use
- 12 priorities. The SEZs are an expression of the
- 13 national and DOI energy land-use priorities.
- 14 Categorically prohibiting solar
- 15 development in 20 percent of all the SEZs, in general,
- 16 and 40 percent of the largest SEZ's, in particular,
- 17 fails to strike this balance.
- We've -- we've thought of an approach and a
- 19 balanced approach that would help the -- the final
- 20 PEIS. By mitigating the visual effects of solar
- 21 development in our class-four BLM designation, rather
- 22 than prohibit it altogether under class two, we believe
- 23 that it's a much more balanced approach.
- And, as an example, impact with this Joshua
- 25 Tree National Park within the Riverside SEZ's could be

- 1 reduced by 40 percent by limiting solar development in
- 2 this vicinity to PV and trough technologies lower than
- 3 seven meters in height. Such mitigation, in conjunction
- 4 with the general visual design standards proposed in
- 5 the PEIS, should be sufficient and should obviate the
- 6 need to prohibit developments of foreign mitigation.
- 7 Given the DOI's energy priorities, the BLM
- 8 should also consider off-site visual offset -- off-site
- 9 visual offset mitigation at the programmatic level.
- 10 Such withdrawals are -- are land enhancement actions
- 11 and, instead, will prohibit a class-two designation.
- 12 As BLM is aware, the agency has issued detailed
- 13 guidance on the use of off-site visual offset at the
- 14 project level, and this guidance would apply equally
- 15 well to a programmatic level analysis.
- 16 The desert wash limitations are overly
- 17 restrictive and internally inconsistent with BLM
- 18 policies. The proposed general design features would
- 19 prohibit the installation of solar facilities and
- 20 components within natural drainages (?).
- 21 The SEZs have specific design limits
- 22 requiring avoidance against washes whenever practical.
- 23 These limitations are infeasible. Washes pervade the
- 24 western desert like capillaries under our skin. Large-
- 25 scale solar installations -- installations simply

- 1 cannot avoid them.
- 2 The PEIS needs to acknowledge this fact and
- 3 address desert washes in the same manner it addresses
- 4 impacts to other habitats that are widespread
- 5 throughout the area directly affected, namely by
- 6 recognizing that the widespread presence of desert wash
- 7 habitat makes avoidance infeasible in most instances
- 8 and will instead require a comprehensive mitigation
- 9 strategy by the developers, consisting of other
- 10 measures, such as predisturbance surveys, avoidance or
- 11 minimization of impacts to occupied habitats where
- 12 feasible, and compensatory mitigation. At a minimum,
- 13 such a policy should apply within the SEZs because of
- 14 national energy priority's involvement.
- 15 Finally -- and I hope I'm not getting
- 16 anywhere near the five-minute limit -- is the PEIS
- 17 needs to propose more about the co-location policies.
- 18 A number of the panelists here have referred to visual
- 19 impacts. We are very concerned with those, as well, as
- 20 a developer.
- 21 What we find is, within the SEZs, is that
- 22 the clustering of solar energy projects is very dense,
- 23 especially when -- within the higher resource areas.
- 24 This density of projects creates intense competition
- 25 over the existing generation tie-line routes, between

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- 1 the projects in one or two transmission corridors that2 they are adjacent to or can connect to.
- 3 The draft PEIS contains broad aspirational

4 data encouraging co-location of generation tie-lining.

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- 5 But developers are inherently competitive and
- 6 secretive. The PEIS, if it wants to accomplish co-
- 7 location, needs to go further by proposing policies and
- 8 grant stipulations that require generation tie-lining.
- 9 to be planned and designed to allow other adjacent
- 10 projects to use them, as well.
- 11 As an example, fast-track projects may be a
- 12 year or two years ahead of other projects. And, during
- 13 their EIS evaluation, cumulative impacts of future
- 14 projects are not being considered.
- 15 Such direct policy would -- would also need
- 16 to generally specify procedures for contractual
- 17 allocation of shared rights and obligations, the land
- 18 as well as the physical infrastructure on that land.
- 19 The PEIS should also explain why policies would not
- 20 trigger a connected action from NEPA, specifically the
- 21 review of multiple projects using the same generation tie-line.
- 22. We believe that the NEPA handbook
- 23 provides very clear guidance on case law and why this
- 24 is easily avoidable.
- These are our three general comments, and we

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- 1 appreciate the opportunity to speak this evening.
- 2 We'll also submit these same comments in writing before
- 3 March 17th. Thank you very much.
- 4 MR. DOWDY: Good evening. I -- I don't think
- 5 I've ever followed an Ian before, in making comments.
- 6 I -- I'm from the Arizona Wilderness Coalition. I'm
- 7 conservation outreach associate. And we were founded
- 8 in 1979 and have worked extensively in wilderness and
- 9 protecting wild lands and waters throughout the State,
- 10 especially in 1984, the Great Wilderness Act of 1984,
- 11 and also the Arizona Desert Wilderness Act of 1990.
- 12 We're very interested in the -- the conservation of
- 13 wild lands throughout the State.
- 14 First, I want to thank the BLM for the
- 15 opportunity to provide input today; we're -- we're very
- 16 glad to do that. We appreciate the public process, and
- 17 we are actually very interested in seeing progress made
- 18 toward a sustainable-energy future.
- 19 And there has been a great history of
- 20 cooperation between the BLM and land conservation, in
- 21 general. And we appreciate that. We've worked very
- 22 closely in the past, our organization, with various
- 23 local BLM offices and State offices. And we are looking
- 24 forward to collaborating, also, in the future.
- 25 It's also important to note that the BLM

- 1 currently manages 1.4 million acres of wilderness
- 2 throughout the State of Arizona and we -- they've done
- 3 a great job, and we appreciate that.
- 4 We really do support the alternative energy
- 5 program; I think, largely, the conservation community
- 6 does. And we think it's really important to identify
- 7 lands that are most suitable for sustainable-energy
- 8 development.
- 9 The BLM, of course, being the managing agency
- 10 for so much land in the State, does have responsibility
- 11 to help guide this. And we -- we're glad to see the
- 12 PEIS moving forward, and we're very excited to provide
- 13 -- provide comment.
- We do think, though, it's important that the
- 15 BLM encourages a sustainable approach, that they look
- 16 more at a very focused approach to identifying the
- 17 lands that are most suitable for development. We think
- 18 that's very important. And for that reason we support
- 19 the solar energy zone alternative above the others, as
- 20 we feel like it does a much better job of identifying
- 21 lands that are most suitable and limiting the impact to
- 22 others.
- Conversely, we oppose the solar energy
- 24 development program alternative. We feel like 4.5
- 25 million acres throughout the State is -- doesn't do a

- 1 good enough job of -- of -- of showing developers where
- 2 the most appropriate lands are and lands that have the
- 3 least -- least negative impact on various resources. A
- 4 lot of -- a lot of our public lands are used for
- 5 recreation -- hunting, livestock grazing -- and, of
- 6 course, have a lot of valuable habitats, which we think
- 7 is important to conserve.
- 8 We have provided to the BLM some files in our
- 9 comments that show lands, that have been identified for
- 10 their wilderness characteristics, that we feel like
- 11 need to be conserved. There is almost -- about half a
- 12 million acres of lands, that are identified under the
- 13 solar energy development program alternative, that are
- 14 in conflict with lands that have been inventoried by
- 15 wilderness groups such as ours, that we feel are -- are
- 16 suitable for conservation.
- So, just in summary, we support the solar
- 18 energy zone alternative. It does identify almost
- 19 14,000 acres of land that's -- that's suitable for
- 20 development. We do have some comments about some of
- 21 the details of these three particular SEZs. But,
- 22 generally speaking, we feel like it's a much better
- 23 approach.
- Also, we recognize that there seems to be
- 25 only a need for about 23,000 acres of solar energy

- 1 development over the next 20 years. With -- By looking
- 2 at the 13,000 acres in the SEZ alternative and also the
- 3 8,000 acres that are currently in the fast-track
- 4 permitting process throughout the State, we feel like
- 5 it's -- it should be quite easy to get enough land for
- 6 the foreseeable forecast of -- of solar energy needs
- 7 throughout the State of Arizona.
- 8 Recently we were presented the -- the project
- 9 that the State office is looking at, called Restoration
- 10 Design, which identifies lands that are most suitable,
- 11 lands that have large -- sometimes been impacted
- 12 already, and also lands that are in appropriate
- 13 locations for development. And we think that is a
- 14 great way to move forward and identify additional solar
- 15 energy zones if needed.
- And, again, we look forward to continued
- 17 collaboration with the BLM. We really do appreciate
- 18 the opportunity to comment in this way and, also, the
- 19 support that we've had in the past and the good
- 20 relationship that we have as we move forward to protect
- 21 wild lands and waters throughout the State.
- Thank you.
- MR. CLARK: Hello. That's sensitive.
- Well, my name is Matt Clark. I'm the
- 25 Southwest representative with the Defenders of Wildlife

- 1 in Tucson. Founded in 1947, Defenders of Wildlife is a
- 2 nonprofit organization with more than a million members
- 3 and supporters across the nation, and we are dedicated
- 4 to the protection and restoration of wild animals and
- 5 plants in their natural communities.
- 6 Thank you for this opportunity to present our
- 7 thoughts and -- initial thoughts and impressions
- 8 regarding the solar PEIS.
- 9 With the PEIS being only 11,000 pages, you'll
- 10 be glad to know that I've shaved my comments down to
- 11 only four pages. So, you know, the -- the BLM has done
- 12 -- attempted a monumental feat with this document. And
- 13 it does represent a huge effort and an important step
- 14 forward, particularly as it proposes to focus the land
- 15 development in fewer places with, hopefully, fewer
- 16 wildlife impacts and focusing limited public and
- 17 private resources on projects with a higher likelihood
- 18 of success.
- 19 However, the document falls short in a number
- 20 of areas, and the preferred alternative seems
- 21 inconsistent with the "Smart from the Start" concepts
- 22 that Secretary Salazar and BLM Director Abbott have
- 23 publicly supported. We believe, though, that, working
- 24 together, this can be remedied.
- To reach the 80 percent reduction in

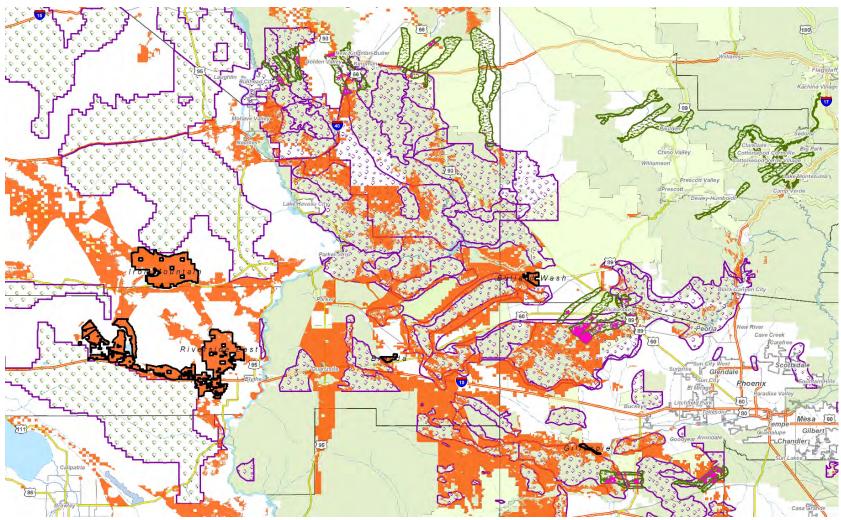
- 1 greenhouse gas emissions by 2050 and avoid the worst
- 2 effects of climate change, we will need to maximize the
- 3 enormous renewable-energy potential in the U.S. And
- 4 our public lands can help us reach that goal.
- 5 But, because of the size and nature of many
- 6 large-scale renewable-energy projects, care must be
- 7 taken to ensure that the places chosen for development
- 8 will result in the least impact to wild places,
- 9 important habitats, ecosystems, cultural and historic
- 10 resources, and other important aspects that we all
- 11 derive from our public -- our public lands.
- So, in an effort to flag areas that will
- 13 generate significant controversy, the environmental
- 14 community has developed this list of criteria for areas
- 15 to avoid in siting renewable energy projects: As has
- 16 been discussed earlier, proposed wilderness areas;
- 17 national monuments; and citizen group wilderness
- 18 inventory areas, that were just discussed by Ian, here
- 19 in Arizona and in other western states; locations that
- 20 support sensitive biological resources, including
- 21 federally designated and proposed critical habitats,
- 22 significant populations of Federal or State treasures
- 23 and endangered species, significant populations of
- 24 sensitive, rare, and special-status species, and rare
- 25 and endangered plant communities.

- 1 An example. I don't know if -- if you can
- 2 put that up, that -- that map up there. And I don't
- 3 know if you'll be able to see the map from where you're
- 4 sitting, but it just gives you an example of the
- 5 species that will be impacted here in Arizona.
- 6 This is a map of -- that I created of -- a
- 7 map, Sonoran Desert tortoise habitat, which is in
- 8 purple, kind of silver purple. And that's overlaid
- 9 with the BLM's preferred alternative, which is in 10 orange.
- And then you can see the -- the black areas
- 12 outlined are the solar energy zones, the more discrete
- 13 areas. And in Arizona those are here (pointing).
- So the point -- and -- and the green areas,
- 15 the kind of connective areas that you see there, are
- 16 the modeled wildlife linkages that Northern Arizona
- 17 University has done in conjunction with State Game and
- 18 Fish, ADOT, and others. And the point being that, if
- 19 we don't want the Sonoran Desert Tortoise to be in the
- 20 list of species headed towards extinction, we need to
- 21 be very careful where we develop solar energy such that
- 22 it doesn't -- not only destroy habitat but prohibit the
- 23 species from having a connected metapopulation that
- 24 will allow it to -- to persist into the future.
- 25 Other examples that -- for exclusion: Lands

- 1 purchased for conservation, including those conveyed
- 2 back to the Federal Government; and biological wildlife
- 3 linkages, as described; National Historic Register
- 4 eligible sites and other known cultural resources;
- 5 locations directly adjacent to National or State Park
- 6 units.
- 7 And locally, here in Arizona, we're
- 8 recommending that lands in Pima County, Sonoran Desert
- 9 conservation land, the conservation land system, be
- 10 removed from further consideration. Also, lands in the
- 11 San Pedro River basin, particularly right adjacent to
- 12 the National Riparian Conservation area that have been
- 13 identified, should be removed from further
- 14 consideration. Lands on the Arizona Strip, House Rock
- 15 Valley, and the Arizona modeled wildlife linkages, as
- 16 mentioned, should all be eliminated from further
- 17 consideration.
- And, with regard to the preferred
- 19 alternative, which is four and a half million acres in
- 20 Arizona, we believe that this option would really do
- 21 nothing to solve the problems of how the Interior
- 22 Department does business today with regards to solar
- 23 energy development. And, in opening up this larger
- 24 amount of acreage, according to the BLM's own study, to
- 25 reach our clean energy goals, it would -- In attempting

- 1 to do that, it would create the same sort of gold rush
- 2 mentality that's been driving solar energy development
- 3 over the past year or so and would likely lead to
- 4 insufficient and inconsistent environmental reviews,
- 5 resulting in big impact on our wildlife and natural
- 6 lands and more of the same uncertainty for project
- 7 developers, including slow-downs in cost and
- 8 modifications to lessen the project's impact.
- 9 And so we believe we cannot continue to
- 10 develop solar energy on a project-by-project basis,
- 11 either. And to do so would certainly result in greater
- 12 impacts on the environment in the West. And this also
- 13 would lead to uncertainty, conflict, and delays.
- So we -- we, too, are in support of the zone,
- 15 the alternative solar zone. We believe that -- that
- 16 the sites in Arizona, for the most part, avoid a lot of
- 17 conflicts. And there should be a process for
- 18 identifying new solar zones. And I think that the
- 19 restoration design energy project here in Arizona is --
- 20 is applying some principles that could help us to get
- 21 there in terms of screening sites that are appropriate.
- And, with the zoned approach, we believe
- 23 that, even though it's done with a more-detailed
- 24 analysis, we still believe that it needs to conduct a
- 25 more thorough environmental review of the total impact

- 1 on wildlife; water, in particular; habitats; and
- 2 cultural sites.
- 3 And then we wanted to make sure that the
- 4 zones -- okay -- are, in fact, the right places for
- 5 industrial development. And so it's -- it's important
- 6 not only to -- to figure out which areas to exclude,
- 7 but also which ones are most appropriate in terms of
- 8 location, access to transmission and load centers, and
- 9 things like that.
- And, lastly, we want to see that the zoned
- 11 approach lays out clear guidelines for how projects
- 12 should be built, operated, and so that the potential
- 13 for harm to sensitive landscapes and wildlife is
- 14 avoided, minimized, and mitigated.
- 15 Thank you very much.
- MR. ISRAEL: Good evening. My name is Howard
- 17 Israel, and I represent the International Dark Sky
- 18 Association,
- 19 IDA. One must wonder: What is the IDA doing
- 20 here relative to solar development?
- Well, our major concern is light pollution.
- 22 Despite the fact that solar plants are under the sun,
- 23 they are lit at night for safety and security.
- 24 Therefore, our concern has to do with the potential
- 25 environmental impact of light pollution emanating from



Attachment for Presentation by Matt Clark, Solar PEIS Public Meeting, Phoenix AZ 3-1-2011

- 1 these sites.
- 2 IDA is an educational organization that seeks
- 3 to preserve the natural night skies world-wide. Light
- 4 pollution is excessive and inappropriate. Artificial
- 5 light an -- is an increasing problem threatening
- 6 astronomical facilities, ecologically sensitive
- 7 habitats, all wildlife, energy use, as well as our
- 8 human heritage.
- And now I'd like to give you a short course
- 10 on light pollution. I promise you, it will only take
- 11 two minutes. Let's talk about the four -- the four
- 12 components of light pollution.
- 13 Urban sky glow. If any of you have been to
- 14 the Grand Canyon lately at night, if you look to the
- 15 south, you can see Phoenix; you can actually see the
- 16 light glow from Phoenix. And, if you look to the
- 17 northwest, you can see the light glow from Las Vegas.
- 18 That's light glow.
- 19 Light trespass: Light falling where it is
- 20 not intended, wanted, or needed. How many in this room
- 21 have neighbors that keep their spotlights lit all night
- 22 long, shining into your bedrooms? I have a gentleman
- 23 in the back. This is light trespass.
- 24 Glare: Excessive brightness which causes
- 25 visual discomfort. High levels of glare can decrease

- 1 visibility, especially in older eyes. Now glare, going
- 2 down the highway and somebody is coming towards you
- 3 with their brights on high, that's glare.
- 4 And, finally, clutter: Bright, infusing, and
- 5 excessive groupings of light sources, commonly found in
- 6 overlit areas. The proliferation of clutter
- 7 contributes to urban sky glow, trespassing glare. If
- 8 you've ever been to the top of South Mountain at night
- 9 looking over Phoenix, that is light clutter.
- We're concerned about the potential for
- 11 improper lighting at these facilities and how it will
- 12 affect mammals, birds, reptiles, and insects. Folks,
- 13 these facilities will be lit at night, for safety and
- 14 security.
- Let's talk a little bit about the effects on
- 16 wildlife, mammals, for example. The bright lights from
- 17 these facilities will cause these nocturnal mammals to
- 18 experience a loss of their night echo system. Examples
- 19 of these affected mammals are bats, raccoons, coyotes,
- 20 deer, and mice.
- 21 Let's talk about birds. Many species of
- 22 birds migrate or hunt at night. Their dependence on
- 23 darkness makes them extremely vulnerable to bright
- 24 lights in areas that are naturally dark. Birds can be
- 25 drawn to light sources and become fixated on the beam.

- 1 This confusion causes a variety of negative effects,
- 2 such as, over a hundred million birds a year throughout
- 3 North America die in collisions with lighted buildings
- 4 and towers. Not wanting to fly back into the dark,
- 5 they continue to fly in the light beam until they are
- 6 exhausted, fall, or become prey. The artificial lights
- 7 can also cause migrating birds to wander off course and
- 8 never reach their natural destination.
- 9 Reptiles. Lots of reptiles in the desert.
- 10 Nocturnal reptiles can become disoriented by the
- 11 artificial lights invading their homes and experience a
- 12 change in their natural behaviors. These behaviors
- 13 might include appetite problems, resulting in decreased
- 14 weight; decrease in mating, resulting in diminished
- 15 populations; increased vulnerability to natural
- 16 predators and unusual ones like cars and humans.
- 17 Insects, finally. Moths and other insects
- 18 are attracted to artificial light and may stay near
- 19 that light all night. This activity around the light
- 20 expends too much energy and interferes with mating and
- 21 migration, causing operation extinction. It makes them
- 22 easy prey for bats and other nocturnal creatures,
- 23 further reducing their numbers. Impacts all species
- 24 who rely on insects for food and pollination.
- And, finally, the most important point that

- 1 I'd like to make about light pollution is the effects
- 2 on astronomy. Light pollution is a serious problem for
- 3 most amateur and professional astronomers. Located
- 4 just a few miles from the proposed Brenda site is an
- 5 area used by hundreds of amateur astronomers throughout
- 6 the Phoenix and Tucson area for deep-sky viewing.
- 7 Consider this: We have to travel over one
- 8 hundred miles to get away from the lights of Phoenix.
- 9 This area will be located just a few miles from Brenda.
- 10 Any extraneous light from proposed solar energy plants
- 11 will have a great impact, not only on amateur
- 12 astronomy, but quite possibly on professional
- 13 observatories throughout Arizona located hundreds of
- 14 miles away. Did you know that Arizona hosts the most
- 15 astronomical observatories in the world?
- Light pollution to astronomers is analogous
- 17 to having a sewage treatment plant located in the
- 18 middle of a residential neighborhood. Excess man-made
- 19 light being emitted into the night does enormous
- 20 environmental harm and wastes energy.
- 21 It is of utmost importance to protect the
- 22 natural sky to avoid the adverse effects of light
- 23 pollution by advocating for intelligent and responsible
- 24 lighting to protect the night-sky quality, as well as
- 25 astronomical observations, wildlife conservation,

- 1 together with the maintenance of the integrity of
- 2 nighttime landscapes and cultural heritage scenarios.
- 3 Ladies and gentlemen, preventing light
- 4 pollution is the rare issue that costs less to solve
- 5 than to let it continue. So let me give you a
- 6 solution. We urge the designers and contractors of the
- 7 solar panel facilities to consider the use of fixtures
- 8 that will eliminate light pollution while providing
- 9 safety and security.
- Formed in 1988, the International Dark Sky
- 11 Association is the authoritative voice on light
- 12 pollution. IDA educates lighting designers,
- 13 manufacturers, technical committees, and public about
- 14 light-pollution abatement.
- We recognize that the best way to accomplish
- 16 our goal of protecting and restoring our natural light
- 17 is to examine the fixtures that are being manufactured
- 18 today. We have developed a program that is called "the
- 19 fixture seal of approval."
- 20 It's a nonprofit program, and what we do is
- 21 we evaluate every single fixture being manufactured
- 22 today. And, if these fixtures meet our criteria in
- 23 terms of eliminating light pollution, they get our
- 24 fixture seal of approval.
- We appreciate the proposed action of this

- 1 PEIS to develop and implement the new solar energy
- 2 program that would facilitate environmentally
- 3 responsible utility scale solar energy development by
- 4 establishing environmental policies and design features
- 5 related to the utility scale solar energy development,
- 6 especially in Arizona.
- 7 If the International Dark Sky Association can
- 8 be of any assistance in these efforts, please do not
- 9 hesitate to call upon us. Thank you.
- MR. SOLEM: My name is Richard Solem, and I'm
- 11 just here as a private citizen. Although, the reason
- 12 I'm here is because I got an e-mail from Defenders,
- 13 from Matt -- although, probably, I don't know how many
- 14 people did -- to come here and say something. What is
- 15 your opinion about what is going on with this solar
- 16 energy project?
- Well, I'm in support of the solar energy
- 18 zones alternative. And all I'm going to do is give you
- 19 a simple case example.
- 20 On the Defenders of Wildlife site, they had
- 21 an example of something called East Clanton Hills. Now
- 22 I said: Well, I'm going to find out what's going on
- 23 here.
- 24 So I'm going to do a small show-and-tell to
- 25 see what -- show what you I found.

- First of all, the first thing I found when I
- 2 looked up -- I took BLM's map, and I opened it up, and
- 3 what you'll find, wandering eyes, is here. But the
- 4 East Clanton Hills are right here in the middle of this
- 5 map, okay? This is a scale of one to 100,000, so each
- 6 one of these little blocks here is a mile.
- Well, it so happens that the East Clanton
- 8 Hills are abutting, touching with only a wash in
- 9 between, the Eagletail Mountains Wilderness. Now, I
- 10 don't know how many of you know what the Eagletail
- 11 Mountains Wilderness is, but it's such an important
- 12 area. It's a wilderness that was carved out of the
- 13 Eagletail Ranch, a very large ranch in Arizona. And
- 14 it's a large wilderness, and it preserves everything,
- 15 habitats of all kinds. It preserves Indian artifacts,
- 16 all sorts of different types of things.
- 17 This is the Eagletail Mountain ranch, okay?
- 18 Now, the wilderness was carved out of this. And the
- 19 ranch actually is much bigger than this; it's huge,
- 20 probably twice as big as what you see here. But they
- 21 carved it out of the center part. And what I find is,
- 22 here, on a boundary, right within -- virtually touching
- 23 the wilderness -- and then you look on the map that
- 24 Matt put up here. The areas that would be impacted if
- 25 you use anything but the zones, the three zones that

- 1 are listed, would be all through that area. So
- 2 potentially -- and I'm going to talk in this sense,
- 3 tortoise habitat; we'll talk about that.
- 4 The East Clanton Hills are on this
- 5 topographic map called Nonsuch View. Okay, if you
- 6 follow the terrain going right south to the bottom of
- 7 the -- at Payton Wells, the bottom of that point that
- 8 we have in the wilderness, you have a kind of low area
- 9 there. Suddenly, you cross the wash, called Deadman
- 10 Wash, and up you go into the Clanton Hills area.
- Now, the richest tortoise habitat is going to
- 12 be the bajada; it's the slope coming down
- 13 there. So the lower part of the bajada, under the
- 14 criteria you have here with the five degrees would be
- 15 developable, totally developable. Now, anything in
- 16 tortoise habitat that you're even near is doomed for
- 17 them.
- I don't know how long any of you have been
- 19 here in Arizona. But I've been coming out since '53,
- 20 and I remember when the Phoenix Mountain Preserve, that
- 21 whole range, was something like this Clanton Hills
- 22 area. It had the same, almost the same, rise -- maybe
- 23 not as high but the same rise from where you stand here
- 24 at the bajada, at the bottom part.
- Okay, that area used to be filled; it was a -

- 1 a virtual wilderness. Can you imagine that, in '53,
- 2 Phoenix Mountain Preserve being a wilderness?
- 3 Tortoises everywhere. All kinds of things. I mean,
- 4 incredible. All kinds of Colorado -- Colorado River
- 5 Toads. Things you don't see any more.
- Why don't you see them? People came.
- 7 They've destroyed them. Now it's a sterile place. You
- 8 can go and see views, but what do you really see? And
- 9 this is an area right next to the wilderness. It's not
- 10 really protected.
- Now, I understand that citizens' study groups
- 12 have gone into these areas, and they have tried to
- 13 decide what the mosaic of the ecology is and what
- 14 species are there and so forth and how they need to be
- 15 protected, but it hasn't been done. This has not been
- 16 done by BLM or anybody. It's done by public nonprofit
- 17 people.
- And I think that, just as a citizen, if
- 19 that's one example of something that could be heavily
- 20 impacted, then how many other places do we even have
- 21 time to talk about? I mean, blow them up to see what
- 22 they really are, what's really going on there, instead
- 23 of abstract, abstract, abstract.
- 24 This is just something, in me, that I saw
- 25 when I was a child coming here. And I can see it

- 1 happening again, you know, another -- I won't say it's
- 2 a sacrifice zone that you have in every generation,
- 3 with a new kind of energy, but it's something like that
- 4 because we have the ability to obliterate everything
- 5 now if we want to.
- 6 So that's why I'm glad you have the
- 7 alternative of the solar energy zones. To me, that is
- 8 the winner.
- 9 Thank you.
- 10 MS. DEWITT: Hello. My name is Rebecca
- 11 Dewitt. I am with the Sierra Club, but I'm also the
- 12 secretary for the Arizona Green Party, a political
- 13 party here in Arizona and across the country.
- I don't know if I could add any more to what
- 15 everyone else has said. They've all been very eloquent
- 16 and passionate and everything, and I think it's just
- 17 wonderful that you guys have given us this opportunity
- 18 to speak.
- 19 I guess, from my standpoint, having solar
- 20 energy here is a wonderful benefit to our economy.
- 21 It's something that's very needed. It's also a
- 22 sustainable-energy source, which is probably one of the
- 23 wisest things we can do. And it's a good fit for our
- 24 climate.
- I guess I would put my vote in for the solar

- 1 energy zones, as well. I think it's a good fit for
- 2 both sides. It is a benefit to the people who care
- 3 about the environment, the wildlife, the cultural
- 4 aspects of the land that we have here that's so unique.
- 5 And it's also a benefit to the -- the companies who
- 6 want to put in their developments. It gives them the
- 7 option to know exactly what's already been imbedded, so
- 8 there won't be any legal battles; there won't be a lot
- 9 of outcries from the public. And I think it's a good
- 10 balance between the two. So that's where I think it
- 11 would -- the best benefit would be.
- 12 And, in the interest of time, I'll -- I'll
- 13 leave it there. But I think that makes the most sense
- 14 for everybody and that would be the least conflict,
- 15 like has already been said, so thank you.
- MS. BAHR: Thank you for the opportunity to
- 17 address you this evening. My name is Sandy Bahr. I'm
- 18 the chapter director for the Sierra Club's Grand Canyon
- 19 chapter, which is the Arizona chapter.
- The Sierra Club has been around since about
- 21 1892. It was started by John Muir, who recognized that
- 22 when you try to pick out anything by itself, it's
- 23 hitched to everything else in the universe. And I
- 24 think that that's kind of what we're seeing with this
- 25 process, which is why it's so important to identify

- 1 areas that are appropriate for solar development.
- We'll be submitting detailed written comments
- 3 with our environmental partners. And there will --
- 4 Those comments will include Arizona-specific comments.
- 5 But I -- I did just want to provide a few, general
- 6 comments here this evening.
- 7 First of all, the Sierra Club strongly
- 8 supports investing in renewable energy and energy
- 9 efficiency because we think it's critical to address
- 10 these, the greatest challenge that we face as a people,
- 11 and that's global climate disruption. We also have a
- 12 long, long history of supporting protection of public
- 13 lands and have advocated strongly for protection of
- 14 those lands throughout the country and here in Arizona.
- 15 We don't see those two things being mutually exclusive.
- 16 We can identify areas for siting solar appropriately
- 17 and protect our important wild lands and wildlife.
- That's why the Sierra Club is supporting the
- 19 solar energy zones alternative. We don't think the
- 20 solar development program alternative is necessary.
- 21 It's very broad, it's not targeted, and it will not
- 22 address the issue of reducing -- reducing conflicts.
- 23 The success of the Bureau of Land
- 24 Management's solar energy program really depends on
- 25 developing policy and guidelines that will guide

- 1 projects to the most appropriate locations and limit
- 2 the environmental impacts, as well as reduce some of
- 3 the obstacles. Again, the solar energy zones
- 4 alternative can -- can help to do that.
- 5 The BLM needs to help ensure that appropriate
- 6 -- appropriate solar energy zones are identified and
- 7 designated, that solar projects are actually guided to
- 8 those zones, and then also have a process for
- 9 identifying and designating new zones as appropriate.
- We -- we know that the -- the solar energy
- 11 zones in Arizona are -- are smaller, especially in
- 12 light of the extensive solar energy resources that we
- 13 have. But we think that there are opportunities for
- 14 looking to add, perhaps using the restoration design
- 15 energy project that BLM is working on as a guide. That
- 16 project focuses on identifying disturbed lands and
- 17 lands that are on the BLM's list for disposal as
- 18 appropriate for solar development. So we think that
- 19 that might provide an opportunity for additional solar
- 20 energy zones, as well.
- I did want to note that the Sierra Club has
- 22 supported several utility scale solar projects in
- 23 Arizona already. Those are projects that have
- 24 primarily moved forward with very little controversy.
- 25 They are located on agricultural lands; and I think

- 1 that that, in -- in itself, tells an important story.
- 2 Just a couple of other things I wanted to
- 3 touch on. We -- we shouldn't talk about Arizona without
- 4 mentioning water. And we think that the BLM really
- 5 needs to look at the impacts of development on water
- 6 resources and looking to, where possible, prioritize
- 7 low-water-use technologies and -- and -- and actually
- 8 prohibit unacceptable impacts to our water resources.
- 9 The -- the final thing I guess I wanted to
- 10 mention is that there are three solar energy zones in
- 11 Arizona, and we will be providing specific comments on
- 12 those, including recommending some boundary revisions.
- 13 And, just for example, on the Gillespie solar energy
- 14 zone, looking to focus development north of the Agua
- 15 Calienta Road would seem appropriate.
- And, with that and in the interest of time, I
- 17 just wanted to thank the BLM for having this hearing
- 18 tonight and also for looking for a way to really be
- 19 active in identifying areas that are appropriate. We
- 20 think, if you focus in on those solar energy zones, you
- 21 will get there. But, if you continue to move down this
- 22 road of just very broad swaths of land where there are
- 23 a lot of conflicts, we don't think you will get there.
- 24 And -- and, really, this is too important not to. So,
- 25 again, we encourage you to look at focusing the

- 1 approach.
- 2 Thank you.
- 3 MS. SPRAGUE: Thank you. My name is Tiffany
- 4 Sprague. And I am a resident of Phoenix, Arizona, and
- 5 I'm also a big proponent of solar energy. Personally,
- 6 I believe that we should be focusing on dry solar
- 7 instead of developing other programs, but I do realize
- 8 that that's not within the scope of this meeting.
- 9 So, first, I wanted to say: Thank you very
- 10 much for going through this process and for having this
- 11 meeting tonight. I am very impressed with the amount of
- 12 detail that is provided in the PEIS.
- I have noticed a couple of things that are in
- 14 error, such as special-status species that are not
- 15 listed as such in the document. These are species that
- 16 have been recognized by the BLM or the Arizona
- 17 Department -- or Arizona Game and Fish Department,
- 18 pardon me. But these will be provided in more detail
- 19 in further comments.
- I am a proponent of the solar energy zones
- 21 alternative. As with any development, we need to be
- 22 careful to minimize impacts to our public lands. These
- 23 are lands that are important for wildlife, for people,
- 24 and for their own intrinsic values. They provide
- 25 habitats, clean air, clean water, and outstanding

- 1 recreational opportunities, and so much more. So I
- 2 believe that we need to completely avoid sensitive
- 3 lands. We need to avoid areas that are used or
- 4 important for special-status species. And we need to
- 5 avoid any wildlife movement corridors and also
- 6 waterways, including desert washes; these are critical
- 7 for effective ecologic -- ecological processing or
- 8 functioning.
- 9 I believe that, in order to catalogue all of
- 10 the different resources and get an understanding of
- 11 what is in these lands, thorough studies need to be
- 12 done. And, by "thorough," I mean that these need to be
- 13 done throughout the year, preferably for a number of
- 14 years, at different times of the year and also at
- 15 different times of the days, so that you can get a feel
- 16 for the plants and animals that are in these areas and
- 17 that might only be present at certain times during the
- 18 year or active during certain times during the day or
- 19 night.
- I really believe we should be focusing on
- 21 areas that are -- are already disturbed, such as mining
- 22 or agricultural lands, that are not likely to be
- 23 restored to their original condition. And, regardless
- 24 of where development occurs, we must provide mitigation
- 25 options in order to minimize the damage.

- 1 And, finally, I advocate for dry, clean
- 2 technology wherever feasible. As we know, water in the
- 3 desert is very scarce, and we should not further
- 4 exacerbate this problem through solar energy
- 5 development.
- 6 So thank you for the opportunity to comment.
- 7 And, as Kevin Dahl says, go solar.
- 8 MR. GRENARD: I'm Mark Hayduke Grenard. I'm
- 9 a resident of Phoenix and a member of the Sierra Club.
- 10 And I just want to echo everybody who praised the zone
- 11 alternative and to look at disturbed lands first. And,
- 12 since there's already been 13,000 acres designated and
- 13 you only need 22,000 and you have 8,000 additional
- 14 acres already fast-tracked, that will meet the
- 15 requirements, and you don't need the four and a half
- 16 million acres.
- 17 And that's the end of my comment.
- MR. QUIGLEY: Thank you. My name is Mike
- 19 Quigley. I am the Arizona Wild Lands campaign
- 20 coordinator for The Wilderness Society.
- First, I'd like to thank the BLM and their
- 22 partners for having this meeting and giving us the
- 23 opportunity to be heard. We would also like to applaud
- 24 the BLM for taking the opportunity to develop
- 25 alternative energy resources on our public lands. We

- 1 feel that this is a necessary step towards making
- 2 progress on our goal to alter climate change.
- That said, we also believe there are some
- 4 places where commercial-scale solar development on
- 5 public lands is appropriate and some places where it is
- 6 not. So we strongly support the solar energy zones
- 7 alternative.
- 8 Further, we also support a process for
- 9 identifying additional solar energy zones, especially
- 10 in Arizona. We would urge that these areas take into
- 11 account prioritization of ground fields and already
- 12 disturbed lands and exclude lands with high
- 13 conservation value, including lands that have
- 14 characteristics worthy of special protective
- 15 designations like "national conservation area" or
- 16 "wilderness" and also looking at analyses done by
- 17 private citizens and other organizations in the State.
- We strongly support the solar energy zones
- 19 approach because we believe more diligence now will
- 20 shorten the overall project time lines by avoiding
- 21 potential future conflicts. We feel that we can't
- 22 afford to make the same mistakes with solar energy that
- 23 were made when we opened our public lands to mining and
- 24 oil and gas drilling.
- 25 The solar energy alternative provides much

- 1 more directed and -- and clear guidance. And, as such,
- 2 we believe it's an important early step, indeed, a
- 3 "Smart from the -- from the Start" step to a national
- 4 renewable energy program that guides development to the
- 5 most appropriate areas. We feel that, by carefully
- 6 designing and siting solar projects on the front end of
- 7 the process, we can more quickly get more renewable
- 8 energy to consumers at a lower cost and at the same
- 9 time minimize the impacts to water, wildlife, habitats,
- 10 and other national valuable resources.
- 11 Again, we'll be providing written comments
- 12 with our conservation partners, as well, by the March
- 13 17th deadline. We look forward to continuing an
- 14 engagement both with this process and with individual
- 15 companies as they bring forward site-specific projects
- 16 in Arizona.
- 17 Thank you again for the time to talk this
- 18 evening.
- 19 MR. VAALER: Hello. My name is Jim Vaaler,
- 20 and I am with the Sierra Club. However, I'll be
- 21 speaking for myself this evening. I'd like to thank
- 22 you for the opportunity to speak.
- I think, when solar development sites are
- 24 located on public lands, it needs to be in the areas
- 25 where there are no conflicts with wildlife and wildlife

- 1 corridors, no conflicts with archeological sites,
- 2 obviously wilderness. Also, agency- and citizen-
- 3 proposed wilderness study areas should be, I think, off
- 4 limits to solar sites.
- 5 A few days ago I -- I had an opportunity to
- 6 go out to the Bullard Wash site and actually walk
- 7 around out there. I -- My preconceived notion about
- 8 this area, as well, was that it might be kind of an
- 9 overgrazed area, not too -- not too interesting.
- But, much to my surprise, I got out there,
- 11 and I -- me and a couple of others walked about four
- 12 miles out there doing two rather crude transects. And
- 13 I found, just in that -- that brief walking around
- 14 there, two archeological sites. I -- I found what's
- 15 called a -- a pot bust; that is a broken vessel of
- 16 Hohokam pottery. And then another site that contained
- 17 a couple of shards. So -- so I know there's a lot of
- 18 archeology out there.
- 19 The area was also a very beautiful
- 20 transitional area from the Mohave to the Sonoran,
- 21 featuring mostly Mohave but also some saguaro cacti out
- 22 there. The area, as I said, was not heavily grazed. A
- 23 lot of wildlife values were observed. I saw a raptor
- 24 nest in a saguaro, badger burrows, and a wide variety
- 25 of floral species were recorded out there.

- 1 But I guess my main concern with the Bullard
- 2 Wash site is that my understanding is that this is
- 3 going to be basically a scraped-earth policy out there,
- 4 where they go in there and remove all the vegetation
- 5 from the site. And I was wondering if that is really
- 6 necessary.
- 7 My understanding is that the reason they're
- 8 doing this is just in case a fire would crop up and
- 9 burn down the solar site. So I was out there looking
- 10 around for signs of burned vegetation, burned Joshua
- 11 trees. I saw nothing that indicated any history of
- 12 fire out there. So I guess, in closing, I'll -- I'll
- 13 encourage the BLM to use a very light touch on the land
- 14 and encourage the companies to do likewise, I think.
- 15 And thank you again for the opportunity to
- 16 speak.
- MR. WELSH: Thank you for the opportunity to
- 18 make some comments. My name is Frank Welsh, from
- 19 Phoenix, Arizona. I belong to the Audubon, Sierra,
- 20 herbalogical society, civil engineering societies,
- 21 Republican Party, et cetera.
- I would like you to consider something that
- 23 hasn't been mentioned yet. We talk about disturbed
- 24 areas. Arizona has the largest continuous disturbed
- 25 area, almost all the way across the State. It's called

- 1 the Central Arizona Project canal. And it will be
- 2 protected in these solar plants you put inside, in that
- 3 the right-of-way of the canal would be protected, and
- 4 that would take care of our dark skies problem.
- 5 Let me note, too, that that power to pump
- 6 that water uphill over a thousand feet, all that CAP
- 7 water, that power comes from the Navajo Power Plant
- 8 located in Northern Arizona. That power plant could be
- 9 replaced, for instance, by solar powered methodologies.
- 10 Other disturbed areas: I would include the
- 11 Salt River Project canals and all the irrigation
- 12 district canals, abandoned farm lands, of course.
- 13 Transmission lines should also be on disturbed land.
- 14 They can be as bad as the solar plant, itself.
- Now, how you develop the land is every bit as
- 16 important as the where you develop it. Whether we
- 17 scrape the land and leave it totally bare -- I just
- 18 heard that was possibly for fire purposes -- that's one
- 19 way. Another way is to leave the vegetation as it is
- 20 and build around the vegetation. Developers have
- 21 already found that that's possible with golf courses
- 22 and so forth.
- I would also like to reaffirm the comments
- 24 that were made about no riparian areas should be
- 25 disturbed. And that includes the whole floodplain. If

- 1 you want your solar plants washed out, put them in a
- 2 floodplain. We have hundred-year floods every couple
- 3 years out here.
- 4 Now the question becomes -- Oh, let me note,
- 5 too, that, when we talk about disturbed and undisturbed
- 6 land, we live in a desert. As the song said, the
- 7 desert is like an ocean. Most -- Many of our critters
- 8 are found underground. So when you have people out
- 9 looking at certain areas, they should be aware of this,
- 10 that some endangered critters actually live
- 11 underground. Most of the time you won't even see them
- 12 if you go out in the daytime.
- 13 As far as energy goes -- Oh, let me add, to
- 14 the disturbed land, the whole City of Phoenix is a
- 15 disturbed land. How about solar rooftops? I have yet
- 16 to see a study to show how much energy can be produced
- 17 by solar -- by solar, when every rooftop in Phoenix --
- 18 And think of what that would save us in transmission
- 19 lines. As far as I know, there have been no studies
- 20 along that line, but it's about time we started.
- Now, when it comes to water, the CAP canal
- 22 has another advantage. Gee, it's carrying the water.
- 23 We don't have to worry about the water; it's right
- 24 there in the canal. You might have to get a permit from
- 25 the Department of Water Resources, but, still, it's

- 1 there.
- Now, along the same lines, you don't need
- 3 water for solar. I have visited and I've -- well, I've
- 4 visited -- I've attended speeches by Stirling Engines,
- 5 showing how they don't require any water, except to
- 6 wash down the solar panel once in a while. So that's
- 7 something that should be -- The type of development is
- 8 every bit as important, again, as where it's developed.
- 9 Let me see what else.
- 10 Well, one of my big -- this -- There's
- 11 possibly something that should be considered. But are
- 12 we building solar plants for California's energy with
- 13 Arizona water? I hope you'll think about that. I
- 14 don't know whether the Federal Government can get
- 15 around Arizona water rights or not. But I would like
- 16 that to be a consideration.
- 17 Thank you very much. I am glad the
- 18 Department of Energy is here because a lot of this has
- 19 to do with energy. Let's look at the CAP canal and how
- 20 we waste that energy.
- Thank you very much.
- MR. GORSEGNER: Well, with any luck I'll be
- 23 the last one tonight. My name is Eric Gorsegner. I'm
- 24 the associate director with the Sonoran Institute. We
- 25 are based in the Inter-Mountain West and engage on

- 1 sustainability issues, smart-growth types of things,
- 2 which leads us to the promotion of conservation but
- 3 also to the promotion of the development of a robust
- 4 and healthy solar industry.
- 5 I did not prepare any comments tonight, and
- 6 so I was taking little margin notes, and now I'm going
- 7 to have to figure out what I wrote. So I don't want to
- 8 repeat what other speakers said. But there were things
- 9 that I thought were -- were key, and I wanted to kind
- 10 of hone in on them. And we will be submitting
- 11 comments, as well, so you'll get those.
- 12 I think some of the points mentioned by Mr.
- 13 Dowdy and Mr. Quigley, Ms. Bahr, Mr. Israel, and
- 14 others, bear some reenforcement. The notion that the
- 15 zones plus should go -- that's -- it's -- it almost
- 16 shocks the consciousness, to think that that could be
- 17 the alternative we're -- we're left with here.
- We are much more in favor of perhaps an -- an
- 19 expanded solar energy zone approach. Right now there
- 20 are three; I think there could be three times that
- 21 many.
- And one thing that has not been discussed
- 23 tonight is what happens with existing applications that
- 24 are out there. Yes, a lot of them were speculative. A
- 25 lot of them -- And, certainly, a lot of them did not

- 1 make sense. But there are many out there that are on
- 2 some very good sites, where you have disturbed land
- 3 that meet a lot of the criteria that previous speakers
- 4 have talked about. So there needs to be some way to
- 5 fit those into the analysis. And I don't know that
- 6 that's been developed yet.
- Additionally, with the SEZ's, you have the
- 8 economy as a scale. I mentioned that we're interested
- 9 in sustainability. Well, a big part of sustainability
- 10 is economic sustainability. And any place where the
- 11 environment goes, the economy is not far behind. With
- 12 -- with the SEZ's you have consolidation of Intertie
- 13 requests. You have the opportunity to build critical
- 14 infrastructure that's shared infrastructure and -- and
- 15 lower the cost. And it kind of takes a master plan to
- 16 do this, just the same way cities and counties do, to -
- 17 to county zoning, to city zoning.
- Also, we haven't talked about the outreach
- 19 process. I don't think that the entire burden of
- 20 reaching out to the affected stakeholders and parties
- 21 should fall on the BLM. And -- and I want to point to a
- 22 positive example, which is avenue goes solar, who
- 23 initiated a series of open house meetings and other
- 24 meetings to actively engage NGO's stakeholders, others
- 25 who were involved in that project. And it really made

- 1 it a lot easier for them. I think, to the extent that
- 2 anybody who's applying for a permit on BLM does that
- 3 and does not rely on BLM to do all the outreach, it
- 4 makes this a lot easier process.
- 5 Some have mentioned citizens-proposed
- 6 wilderness -- or conservation. There needs to be a way
- 7 to determine how to fit that into this. I don't know
- 8 that that's been determined yet, but there are a lot of
- 9 areas in the State where groups of citizens, self-
- 10 initiated, have volunteers out on the ground with GPS
- 11 units, and they're doing sophisticated land inventories
- 12 and some very impressive work. That needs to be taken
- 13 into account.
- 14 A couple of other small little things. The
- 15 one thing that Mr. Israel didn't mention in his
- 16 discussion about dark sky is the economic impact, and I
- 17 believe the economic impact to Arizona of that industry
- 18 is somewhere just south of two million -- two billion
- 19 dollars. And, when you think of what's going on right
- 20 now in terms of what all we're trying to do with jobs
- 21 bills and trying to jump-start the economy, it occurs
- 22 to me that trying to protect what we have here and
- 23 safeguard that should be one of our primary goals. And
- 24 just by doing some design in the way we -- we construct
- 25 these things to reduce the -- the night impacts would

- 1 be immense.
- 2 And I think that concludes it. So I thank
- 3 you. And, again, I compliment the BLM and the DOE for
- 4 the enormous amount of work that's gone into this. And
- 5 your staff is excellent. Thank you.
- 6 MS. BLACKMAN: My name is Barbara Diers
- 7 Blackman. I'm a citizen of Phoenix, Arizona. And I
- 8 only have one small thing that concerns me, and that is
- 9 about the solar zones. And that is, whether the
- 10 companies that come in to develop -- to develop solar
- 11 projects would be required to file an environmental
- 12 impact statement on how their project will impact each
- 13 place that they develop, regardless of whether you've
- 14 already designated it as a zone.
- 15 And I admit I am blundering into this hearing
- 16 only marginally prepared, having not read all 11,000
- 17 pages. So that's my comment. I would like to make
- 18 sure each solar company that goes into these zones is
- 19 responsible and shows how -- how they're going to
- 20 impact the area.
- 21 MR. BENALLY: My name is Norman Benally, and
- 22 I'm from Black Mesa. That's in Northern Arizona, where
- 23 all this energy -- the lights, the energy -- comes
- 24 from. I grew up right next to a coal mining operation,
- 25 so -- so I really do support this solar project

- 1 undertaken by the Department of Energy and the BLM.
- 2 And, since the New Year's, since January, we
- 3 -- a number of us from the reservation have been
- 4 meeting with the energy companies that own the power
- 5 plants and coal mines and wanting to see if they have
- 6 proposals on the table, as far as transitioning from
- 7 coal-burning power plants to a more efficient
- 8 alternative energy like solar and wind, wind turbines.
- 9 And they don't have really anything exciting so far,
- 10 and -- But we continue to meet with them.
- And -- and on our reservation, the Navajo
- 12 Nation has created a green commission, which is to
- 13 start looking at alternative energy development, solar
- 14 being one of the big ones, and using reclaimed lands
- 15 and some of that Redwood-lined area as kind of, like,
- 16 site-specific areas to start developing for alternative
- 17 energy.
- And I really support this idea of expanding
- 19 alternative energy to BLM lands because we're -- we're
- 20 sick and tired of producing energy for the Southwest.
- 21 We're not going to continue to be the bad reach for
- 22 that, for the Southwestern cities. And we're really
- 23 sick and tired of it.
- I mean, I -- I grew up around the Peabody
- 25 coal mining operation. And the people that live in the

- 1 Four Corners area, that live near the APS power plant
- 2 and that live near the Navajo generating stations, are
- 3 really sick and tired of that pollution that it
- 4 produces.
- 5 And -- and really Phoenix and all of the
- 6 Southwestern states, really, even the Federal
- 7 Government, really needs to look at this alternative
- 8 energy development because we're really pushing to shut
- 9 these coal mines down and the power plants down. We're
- 10 looking at today; like, tomorrow would be the perfect
- 11 day to do it. We're not looking at 20 years down the
- 12 road. We want -- we want to get rid of these
- 13 polluters, the sooner the better.
- 14 And I really appreciate the -- you guys
- 15 bringing this public hearing to give me an opportunity
- 16 to express my view, as well, because I think what -- A
- 17 lot of the grass roots people that I work with on the
- 18 reservation and across the country really support this
- 19 alternative energy development, especially in Arizona.
- 20 And I -- I have served on the board of
- 21 directors, for a national group called the Citizens
- 22 Coal Council, for almost ten years and have seen the
- 23 impacts of -- that coal mining does, the damage that it
- 24 does, and the power plants that create a lot of the
- 25 problems as far as health and cultural-resource

- 1 destruction.
- 2 And we really need to look at this more
- 3 seriously and expedite the process. Instead of looking
- 4 20 years down the road, I really would like to see it,
- 5 this process, move along a lot faster, like, ten years
- 6 maybe.
- 7 That would be -- because we -- we have --
- 8 We're pushing for solar development on our reservation;
- 9 the grass roots people are, not the tribal government.
- 10 The tribal government has some other plans that the
- 11 energy people are making plans for them, and we don't
- 12 support that. But we really want to push this
- 13 alternative-energy development.
- 14 And I see, from the presentations, that you
- 15 guys are looking at the same challenges that we're
- 16 looking at on our reservation. And I figured I would
- 17 just borrow some of your ideas once you're done with
- 18 the EIS, and we would go from there.
- 19 So that's what I have. Thank you.
- MR. SPRAGUE: My name is Scott Sprague, and
- 21 I'm actually a wildlife biologist. I'm here just as a
- 22 private citizen.
- I haven't actually gotten the chance to
- 24 review the draft, so it's possible that the mitigation
- 25 section already addresses my comments. But I just

1	wanted to to put a plug in for incorporation for
2	incorporation of movement studies for some minimum
3	number of focal species. There's an opportunity here
4	for an amazing opportunity for pre- versus post-
5	analysis, which would allow for adaptive management
6	improvement of mitigation strategies for any successive
7	installations.
8	That's pretty much it. Thank you very much.
9	(Whereupon, at 9:04 p.m., the
10	proceedings were adjourned.)
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1	STATE OF ARIZONA)	
2	: SS.	
3	COUNTY OF MARICOPA)	
4		
5	I, Karen Saari, a Certified Shorthand Reporter for	
6	the State of Arizona, do hereby certify:	
7	That I reported stenographically the proceedings	
8	had and testimony adduced at the proceedings held in	
9	the foregoing matter on the 1st day of March, 2011;	
10	that my stenotype notes were later transcribed into	
11	type-writing under my direction; and the foregoing 51	
12	pages contain a true and complete record of the	
13	proceedings had and testimony adduced at said hearing.	
14	Dated at Phoenix, Arizona, on the 14th day of March,	
15	2011.	
16		
17		
18	Karen Saari	
19	Certified Reporter No. 50842	
20	For the State of Arizona	
21		
22		
23		