

# QUADSTATE LOCAL GOVERNMENTS AUTHORITY

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*An Interstate Joint Powers Authority Established in 1999*

June 17, 2008

**State of Arizona**  
County of Mohave

**State of California**  
County of Imperial  
County of Kern  
County of San Bernardino

**State of Nevada**  
County of Lincoln  
County of Nye

**State of Utah**  
County of Washington

**Associate Members**  
City of Ridgecrest, CA

Solar Energy Development Programmatic EIS Scoping  
Argonne National Laboratory EVS/900  
9700 S. Cass Avenue  
Argonne, IL 60439

Mesdames and Gentlemen,

Thank you for the opportunity to make input into the scoping phase of the solar energy Programmatic Environmental Impact Statement (PEIS).

Our organization is composed of the seven county governments and one city within the four-state region of the Mojave Desert. All are contained within the geographic scope of the PEIS.

Our organization is especially concerned about the impacts of energy development on public lands within the Mojave Desert. While we recognize the tremendous potential that solar resources represent within this region, we are also concerned with the already existing regulatory framework that has been established in the desert through the BLM, land use plans, and the Fish and Wildlife Service's designation of critical habitats. Our specific species of concern is the Mojave population of the desert tortoise.

The installation of solar projects is highly land intensive, *i.e.* a significant acreage is cleared of all vegetation and wildlife to generate a single megawatt of power. This will have the direct effect of removing project lands from tortoise habitat since most of the flat areas within the Mojave region contain existing or potential habitat. The PEIS must establish a policy for mitigation for land that is removed from habitat.

Currently the BLM requires project proponents to compensate for developed lands by donating acreages of habitat of equal value to be placed in reserve management. The compensation ratio is usually five acres for each acre developed. With massive solar development potential we see this past practices as inadequate and potentially failing. First, the amount of private land that can be purchased and donated for mitigation has shrunk under the last decade to the point that a mitigation base essentially no longer exists. Second, transfer of private land to public land reduces tax base. Third, the mitigation actually adds no increase in habitat, but only assures non-development of some. Thus, at the very time the land management and wildlife management agencies are struggling to recover the desert tortoise and improve habitat conditions, new developments such as solar energy development threaten to further shrink the species' range.

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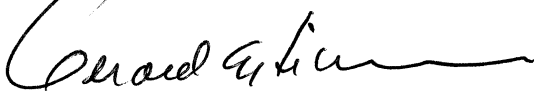
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Counties also have a positive stake in solar development in that the capital investment may be taxed since it is privately held even though located on public lands. It would be desirable if the PEIS addressed this economic revenue factor, so that from a knowledgeable position a complete picture of revenue streams can be assessed. Further, it is our understanding that at least a portion of federal revenues received from projects would be returned to the states and counties where located. To the extent possible, the PEIS should include that portion revenue stream.

At the scoping meeting that I attended in Riverside, several speakers addressed a point regarding the PEIS including an analysis of alternatives to solar energy development in the desert regions. This would include a full discussion of rooftop photovoltaic energy development in urban areas. The PEIS should also address the development of alternative energy sources which would have lower carbon-emitting processes such as nuclear, but which are far less impacting upon broad areas of land. Our concern with solar is that it is not only land intensive; it is also land-inefficient when compared to other energy sources.

Again, thank you for the opportunity to provide scoping input. We look forward to the Draft EIS issued next year.

Yours truly,



Gerald E. Hillier  
Owner and Principal

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