



OFF-ROAD BUSINESS ASSOCIATION, Inc.
www.orba.biz

July 3, 2008

Solar Energy PEIS Scoping
 Argonne National Laboratory
 9700 S. Cass Ave. – EVS/900
 Argonne IL 60439

To Whom It May Concern:

Thank you for the opportunity to provide scoping comments on the solar energy development programmatic environmental impact statement. I am writing on behalf of the Off-Road Business Association (ORBA), a national non-profit trade association representing all aspects of the motorized recreation industry, from OEM manufacturers, to aftermarket suppliers and distributors, and local retailers, including many in the six western states this document will cover.

As you may be aware, area available for off-highway vehicle (OHV) recreation in the western United States has seen an immense amount of interest from renewable energy companies. Many times these companies want to develop the renewable resources in the exact same areas where OHV recreation is currently occurring. We understand the need for renewable energy development and do not wish to be an obstacle in the development of these resources. At the same time, we believe that companies who are making a profit from public lands at the expense of OHV recreationist should be required to compensate or mitigate our loss of recreation area.

"Taking the High Road", a study released in 2002 by the OHMVR Division, states that "since 1980 the amount of land available to recreate on for green sticker vehicles (OHVs) has shrunk 48 percent in our deserts alone, while green sticker registrations have increased 108 percent since 1980." There are almost 1 million green sticker vehicles registered in the state of California alone.

The scope of analysis for this document needs to include any and all potential impacts to OHV recreation. The programmatic environmental impact statement (PEIS) needs to analyze the need for land use plan changes in order to accommodate some of the solar projects. We realize the need for renewable energy development and are not necessarily opposed to land use plan changes to accommodate them. This, of course, would be subject to each specific project and the area where the project would be located.

An alternative should be created that does not allow solar energy development in OHV areas specifically because, the land currently available for OHV use is already not sufficient for the amount people who recreate. If one of the alternatives does include allowing solar energy development in OHV areas then it also needs to come up with compensation or mitigation requirements to replace that land. This compensation can be performed by the BLM or by the private company who will be developing the resource.

In closing we believe that solar energy can be developed on public lands without displacing any of the OHV recreation that is currently occurring.

Sincerely,


 Meg Grossglass

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