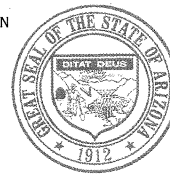




THE STATE OF ARIZONA  
**GAME AND FISH DEPARTMENT**

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July 14, 2008

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

Re: **Solar Energy PEIS Scoping** – FR Doc. E8-12-24

Dear Sir/Madam:

The Arizona Game and Fish Department (Department) reviewed the Notice of Intent (NOI) to prepare a Programmatic Environment Impact Statement (PEIS) to evaluate Solar Energy Development on Bureau of Land Management (BLM) administered lands. The Department supports BLM's efforts in developing the PEIS, and provides the following comments for your consideration.

The Department supports the development of alternative energies, such as solar, provided detrimental effects to wildlife and wildlife habitat are avoided. The PEIS should fully address and analyze the potential impacts to wildlife and their habitats, as well as impacts associated with the loss of public use in those areas including wildlife dependent recreation. Further, this PEIS should not negate the need for NEPA on individual projects, allowing the Department and public the opportunity to review and comment on specific projects affecting public lands.

Both the PEIS and individual project NEPA analyses should evaluate alternatives to using public land for solar power generation. Solar projects depicted in the NOI appear to eliminate all other public uses of multiple-use land, including wildlife habitat and public recreation. The PEIS should evaluate alternatives to using public land for solar energy generation such as supporting utility scale solar generation on private lands and encouraging individual solar generation in urban areas. The Department recommends the use of previously disturbed lands, such as old mining sites and landfills, for solar energy development.

If public lands are determined to be appropriate for utility scale solar development, suitable placement will be crucial in ensuring natural resource protection. The identification of inappropriate areas on BLM administered lands including those areas already identified as sensitive in BLM's Resource Management Plans (including Wildlife Habitat Areas, areas with wilderness characteristics, etc.) will aid in focusing solar development in the appropriate areas. The Department recommends the use of BLM lands identified for disposal and other less environmentally sensitive land for solar energy development.

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The Department appreciates the opportunity to provide comments on the proposed PEIS. For further coordination, and to discuss questions regarding this, please contact Ginger Ritter, Project Evaluation Program Specialist, at (623) 326-7606.

Sincerely,



Laura Canaca  
Project Evaluation Program Supervisor, Habitat Branch

cc: Dave Dorum, Habitat Program Manager, Region I  
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