

Thank you for your comment, katie fite.

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July 7, 2008

To:

<http://solareis.anl.gov/involve/comments>

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

Dear BLM, Here are comments of Western Watersheds project on the Programmatic Solar EIS that you are preparing. We may be submitting additional comments.

We have submitted many of these comments in association with the Westwide Energy Corridors EIS. There are striking parallels to the effect the DOE Corridors (and associated rampant wind and other “renewable” mega-projects would have on the sagebrush biome, and the effects these proposals would have on the Mojave and other southwest desert areas.

Of particular concern is the devastating impact solar projects built on public lands would have on species like the desert tortoise, and other increasingly rare and imperiled native biota.

As part of this Solar EIS process, BLM/Argonne (who we note is in charge of BOTH the DOE Corridors and this EIS) must fully examine a broad range of alternatives. It is clear the Solar and DOE processes are inter-linked, and alternatives that site any facilities much closer to urban areas, that focus on private land development, and that focus on de-centralized energy and home or other solar generation must be fully explored.

Please incorporate the full range of ecological concerns (such as habitat loss and fragmentation for solar-targeted lands biota), the tremendous ecological footprint of a host of linked developments – ranging from powerlines to road networks that these projects would spawn) to this Solar process.

Please fully consider the full range of cumulative effects of

Please also examine the national security threats pose by large-often foreign-owned or financed corporations/consortiums/entities controlling power production on remote public lands. This makes it much easier for process to be manipulated, consumers, gouged, and America’s energy supply be much less secure.

What is the full disturbance and fragmentation Footprint for these facilities for species like the desert tortoise? Especially in a landscape faced with increasing human development, sprawl, military base expansions, threats of brome grasses that thrive on disturbance drastically altering fire cycles, and other ongoing or foreseeable threats?

How will these facilities promote expansion of brome and other weeds? How many areas where these facilities are placed would be grazed by public lands livestock? What are the cumulative adverse effects of livestock grazing?

How will dust stirred up and promoted by livestock grazing disturbance to sites upwind of solar facilities affect solar power generation? Will dust collect on solar panels? As a climate sidenote: Recent studies show the adverse effects of livestock-generated dust deposition on speeding up snow melt.

How will siting of giant solar complexes alter localized weather and other patterns? We understand that vast areas of arid lands will be bladed/bulldozed – cleared of vegetation, paved and solar panels placed. This will certainly alter local winds, local temperatures, and have other effects.

Please describe the current structure of the solar industry –and parties involved in mega-projects vs. small projects.

What areas, close to cities and close to existing grids, would provide suitable solar sites?

Please consider alternatives that would fully bury powerlines in association with any of these facilities.

As with the USFWS Interim Guidelines for Wind Facility Siting, an appropriate set of guidelines must be drawn up and this EIS under all alternatives must establish a careful and systematic process to evaluate ecological and other impacts of facility siting. Under all alternatives, prohibition of solar facility development in biologically, culturally, or other “sensitive” areas and important habitats must be mandatory.

As mitigation here – please require purchase of private lands with important biological values, as well as public lands grazing permits and permanent permit retirement for the specific region where any facility might be built.

Will these arrays - and any shine, reflection or other effect from arrays somehow attract wildlife, and be detrimental in affecting migration, or other behavior?

How much power will be lost in remote siting, vs. siting closer to metro areas and/or emphasis on local and more self-sufficient generation of solar and other power? How might local or self-sufficient generation of power alleviate or reduce rolling black-outs, and other effects of an overloaded centralized grid?

Please compare apparatus and effects of large solar arrays vs. smaller home units.

Again, please apply these comments and the concerns expressed in WWP’s comments on the DOE Corridors EIS (See Below) to this process as appropriate.

Sincerely,

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Western Watersheds Project
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February 14, 2008

DOE West-wide Corridor PEIS
Argonne National Laboratory
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Dear DOE,

Here are amended comments by Western Watersheds Project and the Idaho Wildlife Federation on the West-wide Energy Corridor PEIS. This EIS would authorize 6,055 miles of Energy Corridors that are 3300 feet (3/4 of a mile wide) ripped across some of the most remote areas of the American West. 61% of the project area has existing rights-of-way (either utility and/or transportation –DEIS at 2-43) – but large portions do not. Plus, a road right-of-way is nowhere near 3/4 mile in width as these corridors are. In many areas with existing rights-of-way (Nevada, Oregon critical sagebrush habitats for example), roads or powerlines may currently exist, but they are relatively small (two lane) and do not open the door to colossal development of public lands as the Westwide corridors will.

WWP has also previously submitted comments as part of this process. We ask that all those comments be carried forward, and

applied to this EIS. Plus, we are Attaching comments and letters on SWIP, Browns Bench/China Mountain, Cotterell wind development, and other energy projects that demonstrate the very significant ecological problems with the type and manner of large industrial development in wild land or remote areas of public lands and critical sage grouse and pygmy rabbit habitats that this EIS is designed to facilitate.

We are dismayed that DOE could not be bothered to provide sufficient Hard Copies of the EIS. Sufficient copies were not printed to be provided to the public, and that some parties - even government agencies - are being charged for documents. This appears designed to limit both public agency and private landowners and citizens whose interests are affected by this mega land grab that lays down a network to facilitate fragmentation and mega energy company exploitation of some of the West's most important wild and currently undeveloped landscapes.

Critical information is absent from many of the maps. The DEIS fails to show all existing powerline, utility or other corridors in or near these areas, and across the Interior West. This is necessary to understand the full level of cumulative effects of additional development, and to rationally develop a range of reasonable alternatives. It also fails to show a plethora of highly foreseeable proposed new energy lines that may be punched across critical sage grouse habitats (examples: Ruby, Spectra Energy Bronco, etc). There is no requirement that any energy company or utility use the DOE corridors - in fact a company could get a right-of-way right beside this ¾ mile swath. In our discussions of SWIP leg with BLM officials, we have been informed that MULTIPLE corridors may need to be designated - just in that area alone if all the industrial energy developments of public lands that is anticipated happens. Why designate this massive corridor if additional mushrooming corridors, even in the same area can be obtained at any time? Or -if distance separation is needed between various energy conduits in the corridor and ¾ mile won't even suffice - DOE must also fully address this issue.

We are dismayed at either the purposeful gross mistakes and inaccuracies of the DEIS or purposefully misleading presentation - all, apparently, designed to underestimate the impacts of corridor designation and bias outcomes. For example, DEIS at 3-91, Table 3.5-6 claims that only 15 or so "named streams and canals" in Idaho are crossed by Corridors. This is wildly off. What scale of map is this based on? A view from the Moon? For example, the Corridor in Owyhee County crosses many more named streams. The title of the Table is "Aquifer systems" - aquifer systems do not in any way adequately reflect the number of perennial and intermittent streams these Corridors cut across. When this deficient info is carried forward into a summarized effects analysis (EIS-25), it is clearly mis-represented as the number of perennial and intermittent drainages and canals. As will be discussed later, the same applies even to the estimation of foreseeable wind energy development sites, which is grossly under-estimated in association with the Corridor.

The DEIS fails to consider an adequate range of alternatives, including those focused on locally generated and locally used power - instead of transport (and much associated loss of electrical power) across long-distances ripping apart critical big game winter ranges, sage grouse habitats, pygmy rabbit habitats, loggerhead shrike habitats, cultural and historical sites, landscapes and ecosystems critical to the integrity of National Parks and Monuments, ACEC, WSAs and Wilderness Areas, etc.

There is also no adequate analysis of how these mega corridors that are to serve as the basis for siting hideous polluting coal or other plants, as well as dynamiting public lands to carve out mega corporate-owned wind farms, will devalue private lands and negatively impact the human residents of the region.

Adverse impacts to residents and wildlife and potential health hazards include: Gas explosions and release of all kinds of toxic fumes, routine venting or other operations release of toxic chemicals, herbicide use along huge disturbed corridors and the disturbance associated with the development that will be spawned, pollutants associated with linked/facilitated coal plants and other development, spills or leakage of all manner of nasty chemicals ranging from PCBs to chemical solvents, ground and surface water contamination from materials transported when lines break or rupture, chemical contamination from materials/substances transported or spilled/leaked by the uses of the pipeline, or that may contaminate water used or "run-through" or re-injected in association with geothermal or other development that will be spawned. There may also be cumulative impacts of herbicides and chemicals used with roadways in areas where the Corridor and road r-o-w-s overlap.

There is no analysis of the necessary reduction in livestock AUMs across the entire public lands path of the pipeline. Infrastructure placed into this corridor, and all of the roading and facilities including those potentially fenced, that would be associated with this uses of this mega swath will remove or reduce available livestock "forage" across thousands of miles of the interior West. Necessary AUM reductions will have to occur on all associated public lands grazing permits.

Understanding of the current ecological health of all public lands grazing allotments in and near this mega corridor will also be necessary in order to conduct a necessary NEPA analysis of all the direct, indirect, cumulative, and additive/synergistic adverse effects of this pipeline - on top of chronic grazing disturbance. It is necessary to understand the effects of the additional disturbance associated with the pipeline, which may be much more likely to result in new invasive species problems in landscapes already degraded and disturbed by livestock, and thus "primed" for invasions. See Fleischner (1994), Belsky and Gelbard (2000), Gelbard and Belnap 2003.

A Supplemental EIS is clearly required to fully address the effects on public lands of this tremendous new Corridor disturbance on top of the adverse effects of habitat degradation, loss and fragmentation caused by livestock grazing, and often linked wildfire, roading, vegetation "treatments" and other disturbances. Please see Fleischner (1994), Belsky et al. 1999, Belsky and Gelbard

2000, USDI BLM 2001 Belnap et al. Technical Bulletin on microbiotic crusts) to understand just some of the broad array of adverse impacts from livestock grazing that chronically occur across many portions of the corridor and areas where new development would be promoted. If portions (or all?) of this corridor is not fenced off – then how will livestock grazing be dealt with? How will it be possible to rehab disturbed Corridor lands (soils, microbiotic crusts, native vegetation communities, fragile habitats) with continued chronic grazing disturbance? There is no annual monitoring, Ecological Site Inventory, Rangeland Health, allotment evaluation, lentic or lotic PFC monitoring or examination of condition of aquatic habitat components or other data essential to understand the current condition of the lands the Corridor slices across.

All of this is necessary to understand both indirect and cumulative impacts, as well the feasibility or likelihood of any rehab of disturbance being successful, risk of weed invasions with disturbance, current chronic grazing disturbance and degradation stressors on sage grouse and other habitats. There is no baseline information provided on the existing livestock facilities that serve to degrade or fragment essential species habitat components across the Corridor and landscape impacts – this includes livestock fences, water developments (spring “development” and de-watering projects, water pipelines and troughs, wells) salting sites, etc. – all of which may have spawned an extensive road network over time and are also deleteriously affecting sage grouse, pygmy rabbit and other important and sensitive species habitats. Fleischner (1994), Frelich (2003), Connelly et al. 2004. This is also essential to understand the impacts additional fencing, roading and other development that the Corridor projects and linked wild land industrial developments would spawn.

There is not adequate mitigation or other action associated with this EIS to adequately address the deleterious effects of pipeline, powerline, transformer station, new or expanded roading, etc. associated with placement construction and maintenance disturbance. This will be amplified by livestock degradation of the corridor area and its surrounding areas where development will be promoted. This is essential to understand, because any disturbance effects of livestock grazing are likely to be exacerbated by global warming processes. Global warming is also likely to increase cheatgrass and other invasive species problems resulting from Corridor and livestock disturbance. This will lead to further altered wildfire cycles (Whisenant 1991, Billings 1994) related to corridor projects and grazing. See Pellant 2007 USDI BLM Congressional Testimony. How much will the risk of wild land fires (and thus significant losses of habitat) increase with Corridor development? Wildfires that start due to construction and operation accidents (raptor collisions with lines, explosions, maintenance or operation of vehicles, etc.) may spread well beyond the Corridor and affect a vast area of important and critical habitats for ESA-listed species and sensitive species like sage grouse and pygmy rabbit.

Fences (livestock or corridor-related or r-o-w associated) may have serious adverse effects on mule deer, elk, bighorn sheep, antelope, sage grouse, and many migratory bird species (Connelly et al. 2004). How many miles of fencing will be associated with this pipeline – under a range of development scenarios? How will that block or impede big game use and movement – including during periods of snow accumulation when any supposed “wildlife friendly” spacing will not be “friendly”, movement to seasonal ranges, etc. Where are all critical or seasonal ranges located in the landscape impacted? During nesting season for migratory birds, any Corridor or linked facility fences - as well as Corridor power lines, gas lines, compressor stations, etc. – will provide even more elevated perches for brown-headed cowbird nest parasites on species like sage sparrow, Brewer’s sparrow, sage thrasher, loggerhead shrike, etc., or perches for egg predators like ravens, or predators on nesting birds.

Plus, as DEIS Appendices show, the Corridors slice across or impinge on Wildlife Refuges, Wilderness areas and other important wild lands. Note: We can find no mention of Forest Inventoried Roadless Areas. Placement of high tension lines in or near Wildlife Refuges, sage grouse leks, migratory bird flyways, etc. may have serious adverse impacts to migratory birds – and result in mortality and population losses, including of birds that breed in Canada, and are internationally significant. Where are all known migration corridors or pathways? Please conduct necessary baseline studies to determine migratory bird routes, especially in the Great Basin and other areas where such routes may be less known. What percentage of the population of each species may use each route? How might this Corridor, and also the development that may be spawned such as industrial wind farms on remote ranges affect population viability?

All of this must be determined NOW in a comprehensive EIS analysis– as many of the Land Use Plans to be amended contain specific protections for big game and sensitive species, as well as some wildlife species “forage” allocations and population goals. The consequences of any Amendment can not be understood unless current and comprehensive wildlife information is provided.

Please provide a full and detailed analysis of how any rehab of disturbed areas would occur, how any rehabbed areas would be protected from grazing – will entire pastures be closed? – or more fencing built? Will native species only be used in any site rehab? How will global warming impede rehab of Corridor disturbance zones? This is no small question – because invasive species like cheatgrass (promotes wildfires – see Billings 1994) and tumbleweeds thrive in disturbed areas. Windblown tumbleweeds and tumbledustards at times endanger motorists on roads, clog fences, heighten fire danger, etc.

There is no detailed analysis of the adverse effects on health and safety of motorists on federal, state, and local highways in the area of these corridors. What dangers does the infrastructure foreseeable here pose? Besides windblown weeds - What effects might fencing have in concentrating livestock or big game use on roadways? What exposure will passing motorists have to herbicides used to control weeds thriving in corridor disturbance zones? Please note that the BLM Weed EIS (Vegetation Treatment EIS) is considered by many to be greatly inadequate in addressing ecological and human and wildlife health concerns related to the use of a great number of herbicides across public lands. Will corridors be blocked off from motorists – or will all of the roading necessary to construct and maintain the corridor infrastructure

How will this (especially transmission lines) affect the safety of small plane operation, and landing at smaller airstrips across this vast area? This can have ramifications for emergency medical service on remote areas, state or federal agency monitoring of land conditions or wildlife populations, wildland fire fighting, and many other increasing uses of small plane airstrips.

There is no discussion or analysis of the current ecological health or importance of all the lands that will be affected by this swath, or the lands where new development is likely to occur as a result of this corridor. This is important not only to understand the difficulty of any rehabbing and the likelihood of invasive species dominance, altered fire cycles, etc. with Corridor development, but also to understand the relative scarcity/tremendous ecological importance – of tearing apart the remaining less developed landscapes and habitat areas especially in shrubsteppe, salt desert shrub and other arid habitats. Landscapes will be fragmented and torn apart once the Corridor infrastructure is in place. Example: Figure 2.2.4 shows areas of potential wind development in remote areas. We stress that this map seems to be greatly understating possibilities – vs. western Wind Potential maps that we have often seen! Such wind development - as by mega often foreign-owned corporations like RES UK to export power to Las Vegas or some other big city (as discussed below, see Attached Times-News 2008 article on Browns Bench (China Mountain). However, the real point here is that the lands in the Owyhee region of Oregon and Idaho shown for Potential Wind Energy contain some of the largest remaining relatively intact blocks of shrubsteppe habitat. This was shown in ICBEMP and other analyses (Wisdom et al. 2002, Connelly et al. 2004). Siting this mega Corridor that will promote huge corporate and potentially foreign-owned wind facilities in remote areas of the Owyhee Canyonlands would doom sage grouse, pygmy rabbit and other imperiled wildlife species populations in one of the few remaining “core” population areas. Please conduct a full-scale analysis of the effects of this development on short term, mid term, and long-term viability of all BLM sensitive species populations, and the significance of these core habitat areas and populations to the species as a whole (see Wisdom et al. 2002, Connelly et al. 2004 as a starting point for this analysis).

We again note that the mapping in Figure 2.2.4 (page 2-17) greatly underplays areas of potential wind development – including large areas of Nevada BLM lands where MET towers may already be placed, and where wind facilities have been discussed. Perhaps this is being done to minimize public understanding the tremendous damage that would occur with the long north-south leg of the Corridor associated with the greatly inadequate SWIP segmented EAs being conducted in bits and pieces to also minimize public understanding of the full effects of energy corridor development in the West?

There has been a large amount of discussion and promotion of wind energy development on remote public lands in areas in and near the SWIP swaths. Ely and Elko BLM know this – why have you not included that here? The windy ridges and plateaus (both in the area colored purple on your map as well as across of the Nevada landscape that you have omitted) lands are critical to maintaining viable populations of sage grouse and pygmy rabbit. They are also critical migration corridors for migratory birds, and placement of hazardous powerlines, wind facilities, likely lighting that may lure some species during migration, etc. would have international significance – as these serve as migration corridors for raptor, migratory songbird and perhaps bat movement north to Canada and south to Mexico. The bottom line is that the EIS appears to have purposefully downplayed the linked and foreseeable industrial wind farm development areas to cover up the tremendous ecological footprint that these corridors would have.

Figure 2.2.4 does, however, show areas of “Potential Geothermal Energy Development”. This includes the entire range of sage grouse and pygmy rabbit in Nevada including the Nevada Owyhee Canyonlands, the SWIP zone of development north-south through Nevada, significant wild and undeveloped areas of Oregon including the Trout Creek, Alvord Desert and Steens region and portions of the Owyhee. It also includes large swaths of the Jarbidge BLM lands, Bruneau BLM lands, and much the northern Snake River Plain and portions of the Idaho batholith. Anything that facilitates industrialization of this landscape will have a tremendous adverse impacts to sage grouse, pygmy rabbit and other important and sensitive species in this region, as well as rare aquatic biota.

Development of geothermal energy facilitated by this Corridor would have a broad array of adverse effects to wildlife, recreational uses of public lands, and potentially even agriculture. For example, the Bruneau snail is an ESA-listed species that is tied to hot water springs in the lower Bruneau River watershed. It is already on a trajectory headed towards extinction due to Simplot and other large irrigators depleting ground water. Further tapping into or altering geothermal waters would accelerate aquifer depletion and snail extinction. Geothermal development would also deplete, alter and potentially destroy important recreational hot springs, or areas with important cultural importance to Native Americans.

Large geothermal facilities themselves have a significant Footprint on the environment, and lead to further habitat loss, alterations and fragmentation. The Footprint includes new and/or expanded road networks to facilities, new spur powerline corridors – and all the adverse effects associated with these - from elevated perches for sage grouse nest predators or pygmy rabbit predators in livestock-degraded landscapes that have suffered extensive alteration of shrub structure and denser sagebrush - to weed invasions from disturbed areas choking pygmy rabbit habitats. There is also greatly increased human activity (including during sensitive wildlife wintering, birthing or nesting periods) associated with siting energy facilities in remote areas, as well as increased wildlife mortality on roads, or from collisions with infrastructure.

As this EIS will result in new roading, new development, transport or use of hazardous substances and environmental pollutants/contaminants, a broad array of effects on ground and surface waters may occur. These effects range from increased sedimentation (for new or expand road networks) that pollute and clog endangered or sensitive salmonid, springsnail or other habitats, to pollution/contamination from PCBs, petroleum products, herbicides, etc. contaminating ground and surface waters – with impacts to aquatic species, wildlife, human populations especially rural well water users, and even wild horses.

Construction of new roads or facilities with this mega-Corridor will alter hydrological processes, and may affect both ground and surface waters – and a broad range of native wildlife species, and human uses and enjoyment of wild land waters – including fishing opportunities. For example, sage grouse brood rearing, especially in desertified livestock-depleted landscapes is tied to green vegetation on wet meadow and other areas. Roading that alters hydrological flows, or energy development linked to this EIS that depletes ground or surface waters, may have significant adverse impacts to sage grouse.

On top of this, geothermal or other development linked to or spawned by this mega-Corridor will further later or deplete surface and ground waters. Of great importance are the effects of potential depletion on exceedingly scarce spring sources in high desert regions of Nevada, Idaho, Oregon, California. Springs are critical to a broad array of wildlife, and many have already suffered large-scale degradation, depletion and in some cases been killed entirely by the effects of livestock grazing and BLM and forest service “development” for livestock. See Sada et al. 2001, BLM Technical Bulletin, describing the sad and sorry state of many of the region’s springs. A Supplemental EIS must fully examine the current condition (including both water quantity and quality and any documented changes over time up to this point) of springs, seeps and riparian areas across the affected landscape. It must then determine the effects of Corridor and associated, linked or foreseeable development on these critical riparian/watershed areas.

Riparian areas across the arid West will be under even greater stress, and facing further flow reductions due to diminished snow pack, increased temperatures, and other factors linked to global warming. How will this Corridor and the linked and foreseeable development amplify global warming effects and losses to riparian areas?

How will development of this corridor affect municipal watersheds?

There is no analysis of the enhanced national security protection for energy (not to mention the energy conservation that could occur) with locally generated and used power vs. this mega swath where many energy structures/facilities would be concentrated.

The effort appears aimed at promoting and continuing large corporate control of the nation’s energy supply. Now the Bush administration has run this country into trillions of dollars of debt, at the same time as large energy companies have profited. It is now many of the same giant energy corporations that would most benefit from opening up vast swaths of public land to large-scale corporate energy facility development with this West-wide Energy Corridor DEIS. Many of the corporate entities are foreign-owned or have significant foreign ownership. How can it be considered energy independence, or in the interests of “national security” to push in these mega-corridors – when the energy that is developed will often be controlled by foreign money interests, and thus to an unknown and unassessed degree – subject to foreign control? This seems sort of like the energy equivalent of the Dubai Ports deal. With wind, geothermal or other energy development across public lands, even remote areas in the heart of the country will come under control of energy giants. Reliance on this system only facilitates the Enron-type crises engineered for financial speculation and other purposes – and that could run counter to national security.

Plus, this EIS also encourages remote siting of coal or natural gas plants – again something that could only be done with a tremendous investment and under control of a few powerful corporations. It also thus promotes the large-scale environmental ravages of public lands to obtain coal, natural gas, oil shale, tar sands, or other fossil energy.

The bottom line is that part of the purpose behind this appears to be to facilitate and ensure continued large corporation dominance of energy by encouraging remote public wild land “development” that is only likely to occur with massive investments of capital. Under this EIS, both “renewable” – even though it is hard to consider dynamiting an industrial wind facility into a mountain on top of sage grouse leks “renewable” – and non-renewable energy on an industrial scale, and exporting energy across long distances – is the focus. A Supplemental EIS must be prepared to examine the full economic and energy “security” effects of the energy structure of the U. S. that this promotes.

We are also very concerned that sufficient independent analysis of chokepoints and solutions for chokepoints has not occurred. It is in the interests of large energy producers and power companies the may be in league with to claim problems exist where there are none. Look at Enron! We ask that court records and proceedings related Enron be analyzed as part of this EIS to determine any real need, and the way energy companies may currently be gaming the system to claim chokepoints.

A much broader range of alternatives must be developed to focus on smaller, less destructive energy production - and that includes using existing corridors wherever possible. There has been no systematic and fact-based examination of any “need” for the particular swaths of the singl