

Thank you for your comment, Sam Pace.

The comment tracking number that has been assigned to your comment is SolarS50294.

Comment Date: July 14, 2008 08:19:34AM  
Solar Energy Development PEIS  
Comment ID: SolarS50294

First Name: Sam  
Middle Initial:  
Last Name: Pace  
Organization: Saguache County Board of County Commissioners  
Address: County Courthouse  
Address 2:  
Address 3:  
City: Saguache  
State: CO  
Zip: 81149  
Country: USA  
Email:  
Privacy Preference: Don't withhold name or address from public record  
Attachment: BoCCScoping Comments foBLM SolarDev PEIS-9 July08.rtf

Comment Submitted:

See attached file [See Attachment.](#)

**To:** Ray Brady, Manager, Energy Policy Act Team, Bureau of Land Management  
**From:** Board of County Commissioners, Saguache County, Colorado  
**Date:** 9 July 2008

**Re: Scoping Comments for the BLM Solar Development PEIS**

Thanks for initiating this Programmatic Environmental Impact Study for utility-scale solar energy development on public (federal) land. As the County that we represent has favorable conditions for this type of energy development, we appreciate the opportunity to participate, both by helping to scope the parameters of the PEIS as well as acting as a cooperating agency for the process.

The following are areas that we find need to be studied in order to comprehensively assess the various impacts of large-scale solar development. We have followed these with a few points that, while technically outside the stated scope of this PEIS, are issues highly relevant to our nation's energy policy.

1. **Revenue sharing.** - As there is no issue of severance taxes in the context of solar development, how does the facility host location, and those inhabitants (including non-human) impacted by large-scale installations and their requisite transmission lines, benefit from these installations? Under current policy, all right-of-way rents are channeled directly to the U.S. Treasury. . A meaningful percentage of the right-of-way rental fees, and/or profit-sharing by the utility need to be directed locally to offset any environmental, recreational and quality of life degradation of impacted inhabitants. We are especially concerned as approximately 70% of our County is public land.
2. **Water use** – While we have a great deal of solar radiation capacity in the San Luis Valley, the available water is already fully allocated. Many of the locations targeted for these facilities in the 6 stipulated Western states are desert areas. Therefore, a thorough and realistic assessment of water use, maximum application of available water conservation measures, and the appropriate sourcing of the water requirement are essential for the viability of any utility-scale solar facility.
3. **Interdisciplinary, collaborative approach** – We were pleased to note in your PEIS Notice of Intent that you have committed to an interdisciplinary approach to the PEIS development that includes wildlife, hydrology, air quality, vegetation, soil, visual resources, sociology, economics, outdoor recreation and archaeology expertise, as well as solar energy. We also note your commitment that “the PEIS will evaluate direct, indirect, and cumulative impacts to wildlife, wildlife habitat, threatened and endangered species, and vegetation; proximity to wilderness or other special management areas” as well as impacts to cultural, paleontological, socioeconomic, visual, and water resources. We look forward to a fruitful collaboration with an agency that acknowledges upfront that “these resources are recognized as significant issues associated with utility-scale solar energy development.” Consideration of the impacts to all of the various interests and life forms that make up a vibrant community at the local level will go far to ensure that the development of solar energy truly serves our shared goal of healthy, sustainable energy sources.
4. **Endangered/threatened species** – As we have some of these in our County (e.g. the Gunnison prairie dog, slender spiderflower, Rio Grande sucker), we appreciate that the PEIS is not intended to take the place of site-specific environmental review for solar development

proposals. It is essential for many of the areas designated for development in the 6 state region that endangered and threatened species have “a revered place at the negotiating table” when impacts (direct, indirect, cumulative) to their already strained habitats are anticipated (by wildlife experts) as a result of the development. We assume that since you have excluded Areas of Critical Environmental Concern and other “special management areas” from the scope of the PEIS, that these will **also** be excluded from any consideration as sites for significant surface-disturbing activities such as utility-scale solar installations/transmission lines. We ask that this be explicitly stated in the final PEIS.

5. **Scraping** – In dry, windy areas such as ours, dust is often a real public health and safety hazard – and also compromises solar generation capacity. Scraping the land also destroys habitat and promotes weeds, which are a constant and pervasive problem in our County. Alternatives to this harmful practice need to be established as a component of determining “best management practices” for utility-scale solar development.
6. **Emissions** – We understand that most utility-scale solar plants are hybrid – i.e. that some form of fossil fuels are used to supplement generation at night and on cloudy days. We are concerned that emissions be both carefully monitored and kept to a minimum, and that the method of bringing any required fuel to the site be as “low impact” as possible
7. **Micro-climate impact assessment** - The San Luis Valley is an unusual microclimate, with unique meteorological considerations including inversion that tend to keep emissions, dust and heat/cold “held” within the Valley. On the scale that solar generation facilities are being considered, we would ask that both per plant and cumulative potential impacts of installations be studied and adequately considered as part the project assessment process.
8. **Visual Impacts** – The scenic beauty of the San Luis Valley is one of its most precious attributes. While it is clear that utility-scale solar plants will be visible in the landscape (and perhaps even inspiring), we ask that the natural beauty be respected and preserved to the maximum degree possible. This would include choosing generation technologies that minimize the need for towers and other infrastructure that are not harmonious with the landscape.
9. **Transmission Lines** – To the maximum extent feasible, these should be underground, in order to protect the health of both people and animals from the potential harmful effects of ELF EMFs caused by high tension lines, and to preserve the scenic vistas that represent one of the primary and most valued benefits that our public lands provide. Any above-ground lines should be sited and designed with the intent to minimize their visual impact.
10. **Roads** – Again, due to dust concerns, wildlife and the fragile ecosystem of our County, roads necessary for construction and operation of plants should be well-planned, constructed and maintained to minimize negative impacts and protect wildlife
11. **Full disclosure of any toxic/hazardous materials** – As distances are far (i.e. longer response times) HAZMAT resources scarce, and our water resource precious, local authorities need to be fully informed of any hazardous or toxic materials used, stored or transported to and from any installation located in or immediately adjacent to Saguache County.

12. **Reclamation Plan** – Any project to be considered must include a comprehensive reclamation plan that will be fully funded by the company proposing it, in the event that the site is eventually abandoned.
13. **Use of public lands for private profit** - Related to our first point, but wider: Public lands belong to the public, and their use should benefit the public. Therefore, there should be a limit to the amount of private profit that can be “taken” from the use of public lands to produce an “essential-for-life” commodity. While energy development is clearly in the public interest, excessive profit, narrowly distributed, just as clearly is not. As a matter of responsible governance, we should not continue to propagate the exploitation of public land, people and taxpayer dollars in the manner represented by the current relationship between some Federal agencies and many non-renewable energy developers. It would be better to leave the public lands undisturbed.
14. **Centralization vs. decentralization** - While we support responsible, ecologically sound utility-scale solar generation, we find that ultimately, energy generation via decentralized rooftop solar systems is the most ecological, sustainable and safe (from a national security perspective) method of both electrical generation and heating options. While we realize that this point is outside the scope of this PEIS initiative, we want to go on record as stating that decentralized solar systems should be supported and promoted as Choice#1 for providing clean, safe energy - especially in rural areas where sheer distance necessitates extensive, costly transmission infrastructure.that may entail significant negative health and environmental impacts.
15. **Conservation** – Another comment “outside of the scope”, per se, of this PEIS, but very much related: We MUST, as a nation, learn to consume less energy. Looking globally, the U.S.’s per capita consumption is, at the very least, an embarrassment in a world struggling with shortages and natural systems which are deteriorating at an alarmingly increasing rate due to pollution/global warming. Yes to developing new (*renewable*) sources, but NO to the degree of waste that has become a very destructive, national bad habit. Federal investment in changing these habits is another essential aspect of a sustainable and balanced energy policy.

Thanks again for the opportunity to provide inputs to the Solar Development PEIS.. We look forward to working with you to further develop a safe, environmentally sound, socially responsible and continually renewable energy source.

In Collaboration,

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Samuel Pace, Chairman

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Michael Spearman, Commissioner

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Linda Joseph, Commissioner