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Solar Energy Development PEIS

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Privacy Preference: Withhold name and address from public record

Attachment: Comments to DOE and DOI 14 July.pdf

Comment Submitted:

[See Attachment.](#)



National Parks Conservation Association®
Protecting Our National Parks for Future Generations®

National Headquarters

July 14, 2008

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

RE: Comments for the Department of Energy/Department of the Interior Solar Energy Programmatic Environmental Impact Statement Scoping Process

To Whom It May Concern:

The National Parks Conservation Association (NPCA) would like to thank both the Department of the Interior (DOI) and the Department of Energy (DOE) for the opportunity to provide scoping comments on these agencies' Solar Programmatic Environmental Impact Statement (PEIS), which aims to further develop solar energy resources in strategic locations throughout Arizona, California, Colorado, New Mexico, Nevada and Utah. NPCA is a non-profit organization dedicated to the protection and enhancement of National Parks, Monuments, and Historic Sites for current and future generations. NPCA currently has a membership of more than 340,000 individuals including over 73,000 members in the six-state region being considered for utility-scale solar development. Our members care deeply for America's shared natural and cultural heritage that is preserved by units of the National Park System and Park Service affiliated areas.

NPCA recognizes the need to diversify and increase renewable energy production for the benefit of our climate, environment and national economic interests. We appreciate the opportunity to participate in this process to identify strategic locations for the production of renewable energy in a way that protects our natural, cultural, and historical resources while operating with the most technologically effective and water-conscious methods available.

The development of renewable energy is a critical component of efforts to reduce greenhouse gas emissions, to avoid the worst consequences of climate change, and to assist the BLM/DOE in complying with Executive Order 13212 and Title II, section 211 of the Energy Policy Act of 2005, as well as assisting California in meeting emission reductions set by AB 32 and Executive Order S-03-05. NPCA supports the development of renewable energy production. However, like any project, proposed solar power projects should be thoughtfully planned to minimize impacts to the environment.

In particular, renewable energy projects should avoid impacts to sensitive species and habitat, and the siting of these projects should not compromise the integrity of designated wilderness, areas of critical environmental concern (ACEC), or National Park Service units that Congress has identified as crucial for the preservation of our natural and cultural heritage. That should also include sensitive areas established or expanded by the Desert Protection Act of 1994.¹ In order to minimize the impact to National Parks, Monuments, Preserves, Historical Sites, Historic Trails, and associated lands designated for protection, NPCA has developed a list of recommendations to be included in the Solar PEIS:

- NPCA requests that the conservation of national park, monument, and preserve viewscapes, wildlife corridors, and soundscapes be fully considered in prioritizing solar energy generating sites (SEGS) and transmission corridors. Similarly, NPCA requests that safeguarding the cultural and historic values of our National Historical Sites and Trails is a factor that receives priority consideration in evaluating the appropriateness of SEGS and the siting of transmission corridors.
- NPCA recommends the DOE/DOI give the highest priority to solar energy generating sites (SEGS) that utilize already disturbed lands, and particularly those lands adjacent to existing power grids, gas lines and with existing infrastructure. The construction costs and environmental damage will be significantly larger if new infrastructure will be required to bring a SEGS "on-line" for production. NPCA also recommends that already disturbed lands in close proximities to cities be utilized for solar energy generation. This will ensure that both the workforce and the product which is generated will not need to be imported, lowering cost and transmission loss, and offering good jobs in a growing field for local residents. Locating SEGS in disturbed environments will also have other benefits, as SEGS will not destroy scenic landscapes, disturb natural quiet, impair excellent night sky viewing, create significant impacts to wildlife, disrupt wildlife corridors, or clear-cut native plant species and communities. Locating solar development on already disturbed land will also have the potential to lower mitigation costs, as much public land harbors federally listed Threatened and/or Endangered Species.
- NPCA recommends the DOE/DOI give the highest priority to SEGS that will be best able to utilize the space leased to it. The efficiency of the SEGS should be measured in terms of Megawatts produced per acre. The BLM stated during the scoping meeting in Barstow, CA on June 17, 2008 that it would let the market decide on the technology utilized; however, as the agency granting the permits, the BLM has a mandated responsibility to manage the United States citizens' land in the most productive manner while considering what will be lost in order to do so. The more efficient a project is per acre, the less total acreage will need to be utilized to meet stated goals.
- NPCA is very engaged on water issues throughout the Desert Southwest. The threat to protected lands and their wildlife and plant communities due to over-allocation, drawdown, and incompatible usage continues to be an issue of concern as we work to protect our National Parks, Monuments, Preserves, and Historic Sites. Desert rivers, seasonal seeps and springs are lifelines for wildlife, plants and humans alike. Monitoring wells have been implemented throughout desert areas to document the drawdowns on water resources in these areas. Seasonal water resources are critical for migrations of birds, and for desert animals such as Bighorn sheep, which have learned over time to rely on them. As water is removed from aquifers, seeps and springs do not reach the surface and are unable to be

¹ 16 U.S.C. §§ 410aaa through 410aaa-83, October 31, 1994.

utilized by species that are dependent upon them, including threatened or endangered desert fish². NPCA recommends that surface water surveys and aquifer mapping be requisite for lands leased to SEGS. This should include a monitoring well on each property that is monitored by an independent third party to assure that water resources are being conserved and that allocations are not being exceeded. Preference should be given to SEGS that recycle water and steam to limit consumption. A water consumption index should be assigned to each project seeking a permit and permits should only be granted to SEGS that demonstrate a willingness to help conserve the desert's precious water resources. The index should be based on total water usage per acre or on water consumed per megawatt of energy produced to ensure that only the most water-restrictive technologies are utilized. The EIS hydrological study should include both the short and long-term effects on any seasonal or perennial springs in the area, as they are of critical importance to wildlife, plant life and recreational visitors of these lands. Riparian areas represent some of the most diverse and rare ecosystems in the Southwest and are of critical importance to the health of the environment. Finally, NPCA urges the BLM/DOE to not grant permits for SEGS in water recharge areas, as this would further exacerbate the loss of the desert's precious water resources.

- The Desert Southwest includes some of the most biologically diverse desert ecosystems on Earth. The extreme climate has promoted an assortment of specialized and endemic plants and animals capable of surviving and thriving in these diverse desert environments. Federally Threatened and Endangered Species including, but not limited to: the Mohave Ground Squirrel, Desert Tortoise, Amargosa Vole, Arroyo Toad, Owens Pupfish, Desert Pupfish, and Mohave Tui Chub do not range outside of this eco-region. Any development for solar energy generation in the Desert Southwest should be accompanied by thorough surveying for state and federally listed plant and animal species, and development of a comprehensive impacts analysis for plant and animal species identified. Any land that is currently under municipal, state, or federal protection or designation or land that has been identified as being core habitat, area of critical environmental concern (ACEC), or an important wildlife corridor or breeding area should be removed from consideration of development. NPCA requests that any land developed be subject to appropriate mitigation, as required in the BLM's Interagency Mojave Desert Ecosystem Program³.
- The destruction of native vegetation communities will have a significant negative impact on desert ecosystems. Deserts are fragile and their plants, animals, and ecosystems are inter-dependent. Once land is clear-cut, the damage is irreparable. The removal of native vegetation is also detrimental to the health and property of humans. The removal of native vegetation can encourage the growth of invasive annual grasses, which have been shown to pose a far greater risk of causing wild fires than native plants⁴. NPCA recommends that a general maintenance and fire prevention/awareness program be created or adapted to deal with this ever-present risk to human health and property. Denuding the desert vegetation can also cause microscopic solids called particulate matter (PM) such as dust to become airborne and thus respirable⁵. NPCA recommends that baseline monitoring for Total Suspended Particulates (TSP) be conducted by an independent third party prior to clear-cutting vegetation and on a regular monitoring cycle (quarterly) to ensure that PM does not

² <http://www.fws.gov/endangered/bulletin/2002/03-06/20-21.pdf>

³ <http://www.mojavedata.gov/about.html>

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http://www.werc.usgs.gov/lasvegas/pdfs/brooks_pyke_2001_Invasive%20plants%20and%20fire%20in%20the%20deserts.pdf

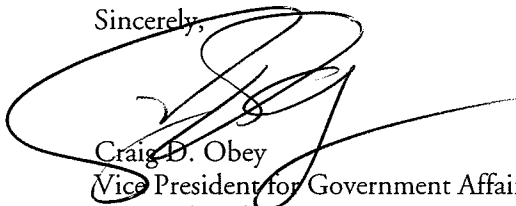
⁵ http://www.mdaqmd.ca.gov/aq_data/aqdata.htm

exceed National Ambient Air Quality standards, and that all projects are in compliance with the Federal Clean Air Act and California or local air pollution laws.

- NPCA urges the BLM/DOE to factor the potential passage of AB 1920⁶: Net Surplus Solar Compensation into the cumulative production necessary to meet its requirements. The passage of AB 1920 would reward California residents who invest in solar electricity systems by allowing them to sell their surplus power directly back into the grid and be paid wholesale prices for it. This legislation would allow electric companies to meet peak energy demand without any infrastructure cost or long-distance transmission losses. This would also allow energy to be a local product and would empower the primary consumers of energy to be producers of energy, limiting the amount of financial and environmental resources that need to be expended in order to meet demand. It is important to recognize that the square footage of rooftops, which are currently exposed to solar radiation, could become a significant source of energy production. There is little cost for infrastructure as these roofs are in place, and all costs for purchase, installation, and maintenance are the responsibility of the individual owner. The ability for consumers to produce energy will limit the amount of resources that will need to be outsourced from the desert, and the amount of water and fossil fuels that will need to be utilized for travel, transmission, and maintenance.
- In initiating a process of this magnitude it is important to recognize that energy production is not the sole answer to the issue of energy supply. We can ensure that energy is produced in a more efficient and less environmentally harmful manner, but that does not eliminate our responsibility to promote the reduction of unnecessary usage through responsible living and working practices, and through the employment of energy-efficient technologies when available. NPCA recommends that outreach and education about energy conservation be implemented as part of this or any energy development plan. An effective energy conservation strategy will ultimately limit the amount of total energy that needs to be produced. Energy conservation efforts will thereby limit the amount of environmental and financial resources that we expend in order to meet energy goals, while promoting habits that will not result in the need to implement further utility scale energy generation projects in the near future.

In summary, NPCA thanks the DOE/DOI for the opportunity to comment on the Solar PEIS. NPCA is a national organization committed to the protection and enjoyment of our National Parklands and National Historical Places for current and future generations. Please feel free to contact us with any questions that you may have concerning the comments made here, or related to NPCA initiatives in the six-state region covered by this PEIS. Thank you again for the opportunity to engage in this important environmental review process.

Sincerely,



Craig D. Obey
Vice President for Government Affairs
National Parks Conservation Association

⁶ http://info.sen.ca.gov/pub/07-08/bill/asm/ab_1901-1950/ab_1920_bill_20080208_introduced.pdf