Thank you for your comment, Karla Duarte.

The comment tracking number that has been assigned to your comment is SolarS50600.

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Solar Energy Development PEIS
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While a programmatic approach to the first tier environmental assessment of solar-energy development proposals is wise, there are several flaws in how this process is being executed.

• Rather than assuming that the only way renewable energy use can be increased is through utility-scale imported power from BLM lands, the DOE should be the lead agency for an assessment of energy supply and projected needs in the urban and suburban areas that these projects are designed to serve. Emphasis should be on providing incentives to industry, local utilities and homeowners to develop onsite renewable energy sources, conservation and retrofitting of existing facilities. Because of existing patterns of development, there will always be a need for distributed power systems, but we should not be assuming that this is a sustainable or desirable path for the future. The alternatives should address meeting energy supply needs from sources other than utility-scale imported energy.

• The BLM in the west is facing an unprecedented number of applications for solar, wind, geothermal, oil, gas, oil shale, and uranium mining projects. Energy development of public lands should be approached cautiously and comprehensively, rather than on the basis of simply processing multiple applications and meeting minimal requirements. Typically the BLM simply defines land as simply “open”, “closed” or “open with stipulations” for certain kinds of uses, while depending on applicants to propose projects. Usually the land closed is a tiny proportion of the land managed. Large tracts of public land have already been sacrificed or are in the pipeline for future energy extraction, energy generation and transmission. Consideration of solar projects in absence of a comprehensive planning approach that directs how future energy extraction, generation and transmission occur is not adequate. Cumulative effects analysis which simply discloses the impacts of energy projects, but does not require upfront coordination of efforts, collocation of facilities or place tight limits on what land is impacted is not responsible land use planning. The alternatives should address minimizing disturbance through collocation of energy generating facilities, the use of existing transmission and road corridors, and the use of previously disturbed public and private lands, including farmland. Consideration of energy proposals should include an assessment of whether another form of power generation (such as geothermal) at a particular site would result in preserving more habitat and other values in the long term.

• No current applications should be finalized in absence of the Record of Decision for the PEIS in order to provide an adequate and consistent planning process. Lease applicants should be encouraged to conduct supporting biological, cultural and other studies while the PEIS analysis is being prepared.

• Much of the energy land rush that is occurring on BLM lands is the result of undervaluing or completely dismissing the intrinsic value of these lands. Aside from the recent massive energy proposals, fragile desert lands have been subject to increased pressure from residential and commercial development, invasive plants, habitat fragmentation, expansion of military training areas and destructive OHV use. Deserts should not be considered “the path of least resistance” in energy development and incentives. Impacts should be fully assessed and minimized. Losses of habitat could be partially offset by permanent closures and purchases elsewhere.

• Staffing of the BLM and reviewing agencies should be increased to allow for complete and timely review and monitoring of projects.