Thank you for your comment, Luther Propst.

The comment tracking number that has been assigned to your comment is SolarS50617.

Comment Date: July 15, 2008 18:25:48PM
Solar Energy Development PEIS
Comment ID: SolarS50617

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Attachment: Sonoran Institute Scoping Comments on Solar PEIS 2.doc

Comment Submitted:

See Attachment.

July 15, 2008

***Delivered via electronic mail***

West-wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

**Re: Scoping Comments on the Solar Energy Programmatic Environmental Impact Statement**

To Whom It May Concern:

The Sonoran Institute wishes to express its support of the agency's efforts to create a programmatic EIS for solar siting and transmission. In these times of high fuel prices and energy insecurity, we concur that the agency's actions to expedite the approval of solar permits through the Solar Energy PEIS is a beneficial step in increasing the production and transmission of electricity by advancing the use of technology that will not add to greenhouse gas emissions and worsen climate change. We appreciate the agency's efforts to establish best management practices and effective mitigation strategies to use regarding decisions on this issue.

While we are confident that any steps BLM takes to implement the Solar Energy PEIS will include thorough environmental review and analysis, there are a few issues of concern that we would like to bring to your attention.

1. **Areas to Be Excluded from the PEIS**
   a. We were pleased to learn that the PEIS will not include lands within the National Landscape Conservation System**,** such as National Conservation Areas, National Monuments, Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers, and National Historic and Scenic Trails. We also agree that the PEIS should not include lands that the BLM has previously identified in its land use plans as environmentally sensitive, such as Areas of Critical Environmental Concern or other special management areas that are inappropriate for or inconsistent with extensive, surface- disturbing uses.
   b. We are also pleased 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; and impacts to cultural, paleontological,

socioeconomic, visual, and water resources. We would also recommend that the direct, indirect, and cumulative impacts of solar projects be evaluated for favored recreation areas. Potential impacts to these resources are significant issues associated with utility-scale solar energy development.

c. We also note that there are many lands under BLM jurisdiction that, although undesignated, are still undisturbed and have high conservation values. These may be inappropriate for large generation facilities and the transmission and service roads necessary to support them. We would recommend that the PEIS not include additional areas such as wildlife corridors, dry washes and waterways, etc. that may not have been formally designated as environmentally sensitive but are likely to be of high ecological value. We would be willing to provide additional information about specific areas of concern, such as the undesignated BLM lands in Western Maricopa County.
d. We would recommend that the PEIS not include areas of significant cultural importance, such as archaeological sites and sites sacred to indigenous cultures.

**2. Areas Preferred for Solar Siting**

a. As a matter of general policy we believe that private lands be given preference for solar development. Solar energy generation has the potential to increase incomes and improve local economic conditions through land leasing in rural communities. However, siting on private lands and the associated economic benefits to local communities are less likely to occur if solar operators are able to obtain sites at much lower prices on public lands. Making private lands first priority sites would also help level the playing field between utility-scale solar and distributed generation by effectively removing the subsidy of virtually free sites for utility-scale solar projects.
b. We are concerned that, given the large number of permit applications pending, many of them may have been filed by speculators who are seeking to create a market for such permits. We hope that conditions created by the oil and gas permitting process, where the number of permits awarded exceeds the number actually being drilled by orders of magnitude, will be avoided through the Solar Energy PEIS process. We recommend that BLM take steps to verify which projects are most likely to be realized in a timely manner by examining project financing, access to existing or pending transmission lines, and other factors before awarding permits. We also recommend that the permits have an expiration date after which they will no longer be valid if a given project shows no signs of being built.
c. To improve transmission efficiency, reduce the need for new transmission lines and additional infrastructure (i.e. roads, water pipelines, etc.), and lessen negative environmental impacts, we recommend that preference be given to potential sites near areas that have already been developed or disturbed over pristine sites in remote areas. An example of a well-sited project is the proposed Solana solar facility west of Gila Bend, Arizona. Although not sited on BLM land, the Solana facility has the potential to provide a buffer between the community and sensitive areas to the west and north.

3. **Additional Issues**
    a. In conducting analyses of the socioeconomic impacts of solar projects to local communities, we recommend that non-market values for undeveloped land be included. Much of the economic value of public lands to the American public cannot be quantified by simply measuring the direct value of resources (in this case, energy) exported from them. Although it is more difficult to quantify the value of quality of life, recreational opportunities, sense of place, and similar factors that public lands provide to local communities, they are a vital component of the Western economy that must not be overlooked. We would be willing to provide additional information regarding or analysis of these values and how to measure them.
    b. We recommend that the potential economic impacts of solar developments on local communities be examined over the long term. Many utility-scale solar projects are expected to have an active lifetime of at least 30 years. Full restoration of solar sites may take a very long time or not be possible at all. Not only should projected benefits from such projects be accounted for, but the economic opportunities that their existence forecloses upon should be examined as well.

Thank you for considering these scoping comments and for your efforts to ensure that the siting and transmission of solar energy from BLM lands is conducted in a manner that fully considers relevant environmental concerns and seeks to benefit the economies of local communities. We look forward to continuing our long-term partnership with BLM through our participation in this process. We are eager to provide additional information and analysis on any of the issues listed above. Please feel free to contact us if you have any questions or need additional information.

Sincerely,

Luther Propst

Executive Director

Sonoran Institute

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