

Thank you for your comment, Deborah Denne'.

The comment tracking number that has been assigned to your comment is SolarS50638.

Comment Date: July 15, 2008 19:45:32PM  
Solar Energy Development PEIS  
Comment ID: SolarS50638

First Name: Deborah  
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Privacy Preference: Don't withhold name or address from public record  
Attachment: The Honorable Gabrielle Giffords2.doc

Comment Submitted:

I just submitted my comments in another submittal and in review of the confirmation it shows that I have given up my right to privacy to my address. I saw no option in your process and DO NOT my address printed in public record. For security reasons, I maintain that level of privacy.

Thank you [See Attachment](#).

**The Honorable Gabrielle Giffords  
U.S. House of Representatives  
502 Cannon House Office Building  
Washington, DC 20515**

**14 July 2008**

**Subject: Review Comments: Solar Energy Development / Programmatic  
Environmental Impact Statement (PEIS) Process**

Dear Senator Giffords:

Below are my comments to the BLM/DOE PEIS Review Team. I attended the July 8<sup>th</sup> Solar Energy Development PEIS scoping meeting held in Tucson, Arizona. From the information I learned at this meeting, I believe a major step of the planning process to be missing.

#### **BACKGROUND / ISSUE**

It is realized that the public was to comment on the programmatic aspects of process, but some of the harder documents of planning, such as graphics exhibiting the locations of possible development sites gave the process an appearance of presenting an actual master plan of development sites as it was verbally presented. It is my concern that BLM / DOE planners are inadvertently providing their assessment of these locations to the general public as a master plan hoping for comments as part of an EIS process and thereby eliminating the step of creating more in-depth specific reviews of these sites adjacent to non-federal lands that may affect regional area governments and the constituency that they protect. It is my understanding that after the approval proposed by September 2010 of the PEIS, these sites are immediately available to developers for application for development. As I perceive it, the whole process of environmental review at a regional level has been eliminated, in that, the federal level approved documents out mandate the precise regional concerns. To do so, would:

- Create solutions that are not best practice management which is a major goal of this programmatic process
- Create distrust for all levels of government, as well as, the progressive developers willing to chance their resources on developing a clean renewable source of energy for American citizens
- Create, in general, ill-will towards a very needed form of clean and renewable energy development

*For this commentary the term "regional area governments" shall imply an umbrella agency under which local governments and non-government organizations (ngo's) with a vested-interest can meet and form a responsive entity to federal agencies. A regional government is broad enough to create manageable units with whom BLM / DOE may co-ordinate and disseminate information, yet still have its review on the "pulse" of local concerns. It will not imply state-level government. Some states have very diverse environmental characteristic to*

*their various regions within their boundaries to render them inadequate to address all the regional concerns without adequate time for co-ordination with their regional counterparts.*

This public commentary period ends today on [15 July 2008](#) and the next step of [the preparation of a draft PEIS ends in September 2009](#) followed by the [approval of a final PEIS in September 2010](#). The implementation stage which is the actual processing of site-specific applications therefore would begin in late fall, early winter of 2010, that is, almost 2011. I believe the process will experience delays due to lack of formalized regional area government process which proves to regional constituents that their "gatekeepers" went through a process that protects their specific regional concerns based upon their local geography and its processes and the interplay with the regional regulations. It also validates the privilege given to developers to initiate action based upon a federal document in a regional community. Lack of this proof of establishing local regulation within a federal process will most likely "trigger" in 2010 after the adopted PEIS which of course will slow down the process of expediently delivering a much needed clean renewable energy source.

It does not appear that the current PEIS document reviews regionally specific areas especially for transmission corridors and biologically diverse corridors which cross between BLM lands and communities, shared watersheds with critical water shortages, just to name a few. A perceived negative affect of development within each specific area may or may not be real, but until regional area planners:

- Assess and define regional lands of sensitivity
- Evaluate their concerns in formalized documentation from their known list of vested-interest parties accessible for the public to read, and
- Assist BLM / DOE with identifying which lands really will be "best management practices" lands for their specific regional area

public outcry may be great at what the government perceives to be the implementation phase and the regional public perceives to be the beginning of the process.

Therefore, major issues are:

- 1) Current PEIS scheduling has not provided time for these groups within their current adopted process. The commentary period to which I am responding, although helpful, in my opinion, does not create a reliable planning tool to keep the process moving forward in the spirit of the original project formation. (*Somehow the creation of another layer of review seems counter logical to moving ahead expediently, but public concern groups if not satisfied can be much longer than a qualified-member community review process.*)
- 2) As mentioned in the PEIS, the BLM has access to GIS planning information as a tool. The only level to provide an orderly, homeland security use of this tool outside the BLM and DOE is the state and regional area governments themselves or their paid qualified consultants. The BLM / DOE charge is a large task. It is doable, but requires regional input to be within smart growth principles and implementation, best management practices.
- 3) The geography being reviewed within six states is so diverse that the creation of development standards by a federal entity to work for each regional best management

practice concern is not possible without very concise studies or those regional area inputs by qualified professionals and technicians. For example, in some areas, a wet-cooling system for solar systems is advisable because water is an available resource, whereas, in others, it is too scarce for use in a large-scale utility development. Local public agencies know their own geographic and technical concerns and the interplay between them to provide for the most efficient use of technology.

- 4) The current programmatic scheduling only is the beginning phase of these developers at a local level and their realization of attaining the start date in 2010 is not realistic, in that, I believe regional concerns will delay the process without having their input into the process at an earlier point. This in turn delays the attaining the national energy goals to switch over from oil, LNG and coal to clean and renewable energy sources.

## SUGGESTED SOLUTION

In order to expedite and simultaneously provide public due process, the BLM / DOE team should identify the regional area governments and request a formal review process to be 85% completed by the time of the draft PEIS in September of 2009.. Their work product, a graphic plan and supportive regulatory texts, would be incorporated within that PEIS for all to review and comment. To obtain that list, the BLM / DOE may approach State level planning offices.

Regional area governments are best suited to this task because they can provide:

- an umbrella structure under which all local government and vested-interest NGO parties can be represented while maintaining a manageable number of enteritis with whom the BLM/DOE team can receive input through their Districts in an orderly fashion negotiate out the regional local concerns.
- A review of sensitive public information through a homeland security approved venue.

Process for the regional area governments should be:

- 1) Invite their list of vested-interest parties and/or advertise to the public for vested-interest parties to meet simultaneously to the draft stage of the PEIS to review the BLM lands up for development within their regions.
- 2) Create for each region a committee of **qualified members** with the charge to develop a regional plan of available lands which includes both a graphic plan with identifiable boundaries of those BLM lands that would be acceptable sites in their region from the already defined sites currently assessed by the BLM and any energy/land-use/ environmental health planning tools, such as, ordinances, codes, and guidelines. Draft regional plans at 85% completion would be submitted in June 2010 to BLM / DOE team for incorporation and review of the Draft PEIS in September of 2009.

*The reference to regional plans developed as part of this process implies a combined end-work product of a graphic plan and support texts.*

- 3) Complete by June of 2010 all regional plans and submit to the Final PEIS for approval in September of 2010.
- 4) Encourage, after the approval of the Final PEIS, all local governments to adopt their finalized regional plan as a supplement to the PEIS and therefore, provide a more precise implementation plan for their region and assure their constituents their concerns as a group have been met
- 5) Encourage development applications through the regional authorities and process through appropriate federal agencies.

Please note: It is generally the concern of regional area governments that plans are not developed based upon political boundaries but by the boundaries of natural systems and expediency to the local politics. Sometimes these two are in accord; sometimes, not. The acreage at the federal level is so great, that even a potential reduction of available developable acreage due to regional planning efforts would still allow for enough land to meet our solar needs as they were expressed in the scoping meeting. Solar development is a low-intensity impact, for the footprint area of the collectors. I see the major concerns for most regions to occur in the transmission and distribution corridors.

Who best to know these areas, but the regional decision-makers and public-interest advocates? These would include the counties, cities, watershed management, and conservation management, etc. organizations that influence local and regional concerns. In our area some of these organizations may be Pima Area Government (PAG), Sonoran Desert Conservation Planners, etc.