

Thank you for your comment, April Sall.

The comment tracking number that has been assigned to your comment is SolarS50643.

Comment Date: July 15, 2008 20:54:27PM
Solar Energy Development PEIS
Comment ID: SolarS50643

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Attachment: PEIS_letter.doc

Comment Submitted:

[See Attachment.](#)



THE WILDLANDS CONSERVANCY

July 15, 2008

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

The Wildlands Conservancy (TWC) would like to thank the Department of Interior for the opportunity to provide public scoping comments on the Solar Programmatic Environmental Impact Statement (PEIS); which aims to further develop solar energy resources in appropriate locations throughout California, Arizona, New Mexico, Nevada, Utah, and Colorado.

TWC is a non-profit public benefit corporation with a dual mission to preserve wildlands for present and future generations and to provide free outdoor education to our youth. As the largest non-profit provider of free outdoor education in Southern California, it is essential that TWC preserves and land purchases funded by TWC be maintained as wildlands to serve our dual mission.

TWC understands the uniqueness and sensitivity of the Mojave Desert and requests that the following comments be applied to the PEIS to maintain the recreation and conservation values of public lands:

- Any land that is currently under private conservation, municipal, state, or federal protection or designation, Areas of Critical Environmental Concern (ACEC), and Desert Wildlife Management Area's (DWMA) are removed from consideration for development.
- Lands purchased with private donations (\$45 million gifted by TWC) and public Land and Water Conservation Fund (LWCF) monies intended for conservation, (i.e. The Catellus Land Purchase) should be excluded from siting and removed from consideration for development. The Catellus Land Purchase resulted in the purchase of nearly 630,000 acres that was then gifted to the Department of Interior for management. The intent of TWC, the U.S. Congress, the Senate and the President, when authorizing the use of LWCF monies for the acquisition of the Catellus lands was *"to preserve and protect these lands form development and to allow their continued use for recreation, parkland, wilderness and habitat protection purposes"*.
- Areas that have already been degraded and disturbed should be prioritized for consideration for development and siting.

- Siting should not occur adjacent to private conservation lands where impacts such as transmission would result in further damage to conservation efforts.
- TWC recommends projects are sited within 5 miles of existing legally designated roads.
- TWC recommends projects be sited within 5-10 miles of existing transmission corridors.
- When siting projects we recommend that they are sited as close to major load centers as possible.
- Projects should be dry cooled (air cooled) and use recycled water when possible, as water is a precious resource in the desert.

In closing, TWC believes that all development on private and public lands will effect the conservation and ecological state of those lands and those cumulative effects and the impacts of large-scale solar development should be reflected in the criteria established for solar project siting. TWC feels it is important for the PEIS to reflect the Department of Energy's Strategic Plan which outlines strategies for that include using existing corridors, local generation and utilizing recent technologies such as superconductor wires and high capacity storage units to maximize efficiency and capacity. The American public has a finite amount of undisturbed lands for conservation and recreation opportunities and management decisions allowing development must balance the need for those opportunities for present and future generations with the "greening" of America's power supply.

Sincerely,

April Sall, Conservation Director
The Wildlands Conservancy