

Thank you for your comment, David Reynolds.

The comment tracking number that has been assigned to your comment is SolarS50689.

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Solar Energy Development PEIS
Comment ID: SolarS50689

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Attachment: Solar-PEIS.pdf

Comment Submitted:

[See Attachment.](#)



United States Department of the Interior

NATIONAL PARK SERVICE

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IN REPLY REFER TO:

L1419 (PWR-LP)

July 15, 2008

Ms. Heidi Hartmann
Solar Energy PEIS Scoping, Argonne National
Laboratory, 9700 S. Cass Avenue—EVS/
900, Argonne, IL 60439.

Re: Notice of Intent to Prepare a Programmatic Environmental Impact Statement "To Evaluate Utility-Scale Energy Development"

Dear Ms. Hartmann:

The Pacific West Region (PWR) of the National Park Service (NPS) submits the following comments on the Notice of Intent (NOI) to "Prepare a Programmatic Environmental Impact Statement (PEIS), to evaluate utility-scale development, to develop and implement Agency-specific programs that would establish environmental policies and mitigation strategies for solar energy projects, and to amend relevant Agency land use plans with the consideration of establishing a new BLM solar energy development program."

The NPS is participating in the planning process because NPS units in the PWR may be impacted by the project. The western states identified in the NOI include: Arizona, California, Colorado, Nevada, New Mexico and Utah. The PWR encompasses all NPS units in California and Nevada, and a NPS unit in Arizona.

General Comments

The NPS recognizes the challenges to development of renewable energy sources in the western United States. However, the primary mission of the NPS is to preserve and protect the National Parks, Recreation Areas, Preserves and Historic sites for the American people. The PEIS should evaluate the indirect and cumulative impacts to land use in the vicinity of NPS units.

Resource Impacts

The Project's impacts on natural resources, cultural resources, visual resources and recreation could be significant and permanent. Impacts will vary depending on the landscape; however, impacts will be permanent and the PEIS should consider the permanent nature of impacts when evaluating impact intensity. For example, clearing vegetation and leveling the landscape to facilitate installation of solar infrastructure becomes a barrier for animal movement and an opportunity for invasive plant species.

Natural resource impacts should be thoroughly evaluated in the PEIS. Construction and operation associated with the action alternatives are likely to impact natural resources including wildlife, geology and soils, paleontological resources, hydrologic systems, and water quality. The PEIS should analyze some site-specific impacts to vegetation and wildlife from utility installation and associated activities.

Ground disturbance will have severe and permanent implications for multiple native vegetation communities, the wildlife dependent upon them, and wildlife corridors. Ultimately, no mitigation measures



can remedy the permanent clearing of the vast tracts of land required for the project. Leveling of the land permanently removes acres of vegetation, impacting mammals, birds and insects that utilize those native habitats. Furthermore, plowing large tracts of land for installation of solar infrastructure can allow the invasion of non-native vegetation which further threatens the native species adjacent to the cleared areas. In essence, the NPS is concerned that the proposed utility facilities and subsequent development will further fragment and isolate parklands into "islands" of habitat leading to reduced biological diversity and stress on sensitive species.

As agencies develop environmental policies and mitigation strategies in response to the potential of severe and permanent damage to the desert landscape, the NPS strongly encourages the PEIS require within the scope, design and designation of connecting ecological corridors across the desert. In particular, it is imperative to identify areas with high natural resource value in the desert, such as watering holes, and ensure wildlife has access to these areas year round.

Land Use Planning

The PEIS should evaluate the indirect and cumulative impacts to land use in the vicinity of NPS units. It is unclear whether the project will lead to growth inducing impacts including the development of new towns and cities in areas that were previously unoccupied or agricultural lands. The PEIS should include an evaluation of the corresponding impacts from potential development to infrastructure including roads, water, and sewer utilities in areas adjacent to NPS units. In addition, the PEIS should identify and evaluate the direct and indirect impacts from transmission corridors created to transfer energy to existing utility infrastructure.

In summary, the NPS requests that the project not develop utility-scale energy facilities adjacent to NPS units. In addition, the NPS will request detailed site specific studies including site specific Environmental Impact Statements for projects that may impact NPS resources. The NPS units affected by the project will work with the project team to provide specific information about resources in the area. If conflicts are unavoidable, the NPS PWR will work with the project team to avoid, lessen, or mitigate impacts to the greatest extent feasible.

Thank you for consideration of these comments. Please direct questions to Jonathan Gervais, Environmental Protection Specialist, on our staff at (510) 817-1536 or David Reynolds, Supervisory Realty Specialist, on our staff at (510) 817-1425.

Sincerely,



Jonathan B. Jarvis, Regional Director, Pacific West Region

cc:

Mike Snyder, Regional Director, Intermountain Region
Field Solicitor, SF Field Office

Jor