

Thank you for your comment, Cecelia Smith.

The comment tracking number that has been assigned to your comment is SolarM60198.

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Solar Energy Development PEIS  
Comment ID: SolarM60198

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Comment Submitted:

Dear Ms. Resseguie;

Thank you for the opportunity to comment on the Programmatic Environmental Impact Statement (PEIS) and the 4 proposed Solar Energy Study Areas comprising 22,380-acres in the San Luis Valley, Colorado. I have lived and worked in the San Luis Valley since 2006. During this time I have served as a consultant to a number of communities, NGOs and local government agencies. I've also worked with industry, our local Federal field offices, the GEO and our State and Federal representatives.

The San Luis Valley (SLV) is already experiencing effects from climate change on wildlife, watersheds, ecosystems and agriculture. Making a swift and effective transition to a renewable energy economy is imperative if we are to have a sustainable future. This transition offers an unprecedented opportunity to re-imagine how energy is produced, distributed and used in this country and I encourage BLM to be forward looking in its approach.

The SLV has many unique values that its citizens have organized effectively to preserve and protect over the years. Due to its high elevation and relatively flat terrain, the SLV has long been recognized for its superior solar energy generation capacity. For a small, rural Valley, we are home to an exceptionally diverse number of renewable energy advocates, off-grid homesteaders and experts in sustainable design and living.

Recently, the US Department of Energy (DOE) and National Renewable Energy Laboratory (NREL), and Governor Ritter's office identify the SLV as the major "hotspot" for solar energy in Colorado. The 2008 Report of the Colorado Senate Bill 07-091, "Connecting Colorado's Renewable Resources to the Markets" identified a "technical potential of 240 GW [2,400 sites for a 100 MW CSP plant] in the San Luis Valley".

Two very different paradigms for solar energy development (centralized vs. distributed) are emerging. While not inherently mutually exclusive, the relative costs and benefits of these competing paradigms are subject of growing interest, debate and concern to our citizens and communities.

In either case one thing is clear: to be accepted renewable energy development must not compromise the San Luis Valley's unique cultural and ecological values (especially water) and must offer a clear return to our communities and not just private corporations. In short, it must support a sustainable future for the SLV without undermining the values that make this a special place. I urge you to be sensitive to these widely held values and to direct our local SLV field offices to work collaboratively with Valley citizens, communities, NGOs and local governments before approving Solar Energy Study Areas or permit applications.

The SLV contains thousands of acres of degraded agricultural lands that are suitable for solar energy development. We are also currently grappling with the removal of 40,000-acres from production to balance long-term water use. Solar energy development should be sited on these degraded agricultural lands before destroying valuable intact public lands. I urge BLM to allow our local field offices to work with industry, the SLV Water Conservation District, private land owners, NGOs and County and regional land use experts in siting and approving Solar Energy Development Zones that contain degraded lands.

Intact lands have enormous public value and should not be destroyed simply because they are publically owned. They provide

important wildlife habitat and protect watersheds, soil and air quality. Wetlands sequester significant amounts of CO<sub>2</sub> and should be preserved at all cost. SLV and regional NGOs have submitted extensive comments on the specific biological values of the 4 proposed SESA's as well as policy requirements of NEPA. I urge BLM to take these comments and recommendations seriously in finalizing the PEIS and not just simply note them in the appendix.

There are already several public and private utility-scale solar energy facility proposals on more than 6,400-acres in the SLV. According to our Rural Electric Coop, industry has purchased options on private lands adjacent to all of the utility substations in the Valley. This haphazard, unplanned approach to renewable energy development leaves the Valley vulnerable to market-driven, unregulated industrialization.

I urge BLM/DOE and DOI to give our local field offices the authority and resources needed to effectively collaborate as noted above and to participate in the development of a comprehensive cumulative impact analysis and SLV-wide plan for renewable energy development in the SLV. Additionally, I urge you to administer all environmental reviews required under NEPA through the local field offices and to allow them to make the final determination regarding the scale and siting of SESA's, siting and permitting of proposed utility scale facilities and cumulative impacts, land use and mitigation.

Lastly, renewable energy technologies are evolving very rapidly. I urge BLM/DOE and DOI not to commit to the "old energy" model currently being pushed by the utility industry. Many energy experts are predicting that large centralized generation and costly remote transmission will soon be obsolete. A growing number of countries, states and communities world-wide are demonstrating that flexibly designed point-of-use renewable energy generation is more efficient, easily permitted, has greater security and can more rapidly integrate new technologies. I strongly encourage the BLM/DOE and DOI to consider a more flexible and cost-effective approach to the rapidly changing renewable energy environment.

Thank you for considering my comments. I look forward to a continued dialogue.

Sincerely,

Ceal Smith  
TIERRA Consultants

Cc: Secretary Salazar, Rep. Salazar, Senator Bennett, Senator Schwartz, GEO.