Thank you for your comment, Steve Saway.

The comment tracking number that has been assigned to your comment is SolarM60218.

Comment Date: September 14, 2009 12:30:38PM
Solar Energy Development PEIS
Comment ID: SolarM60218

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Attachment: Agua Caliente Road Area.pdf

Comment Submitted:

1. In Arizona, the proposed Gillespie Solar Energy Study Area poses serious concerns. It includes a large stretch of Agua Caliente Road and surrounding lands to the south. It's expected that the upcoming Lower Sonoran RMP will designate Agua Caliente Road as a backcountry byway. It serves as a major recreational gateway to pristine Sonoran Desert public lands that offer a wide range of recreational opportunities, including hiking, hunting, dispersed camping, wildlife viewing, rockhounding, OHV backcountry touring, etc., as well as access to spectacular scenery, including the Gila Bend Mountains, Face Mountain, Yellow Medicine Butte, and Fourth of July Butte. This access is important to local rural communities which rely on public lands for recreational opportunities. Also, within the proposed solar study area, several OHV routes lead south from Agua Caliente Road to provide access to the Signal Peak and Woolsey Peak Wilderness areas. Would this proposed solar study area close off access to Agua Caliente Road and connecting OHV routes? If so, the solar energy values cannot begin to match the recreational values that exist now with the public's ability to access spectacular public lands via Agua Caliente Road, mainly west and south of the proposed solar study area. The Gillespie solar study area should either be excluded from further consideration as a solar study area, or at least re-defined to exclude existing routes (Agua Caliente Road and connecting routes) so that the public can continue to enjoy access to high value public lands and pristine Sonoran Desert landscapes outside of the solar study area boundary. I have attached a map which identifies some of the routes that must be protected for public access. In summary, I believe the proposed Gillespie solar energy study area did not receive adequate scrutiny to avoid conflicts with other important land uses.

2. As a general comment, the critical scarcity of groundwater resources in the West must be fully considered when evaluating the suitability of the various types of solar energy facilities. The noted author and water law expert, Robert Glennon, wrote an excellent article in the June 7, 2009 issue of The Washington Post ("Is Solar Power Dead in the Water?") that questions the wisdom of allowing hundreds of new groundwater wells to be drilled in the Mohave Desert to support the huge water demands of concentrating solar power (CSP) utility plants. See this link for the article: http://www.washingtonpost.com/wp-dyn/content/article/2009/06/05/AR2009060501988.html. In my view, BLM should rule that only photovoltaic or similar techologies that consume little or no water will be considered for solar energy development in these western desert solar energy study areas. Where high water use CSP technologies are envisioned, the BLM should require the use of air-cooled CSP solar energy technology which reduces water use by 80 to 90 percent. As Mr. Glennon's article points out, wet-cooled CSP utility plants should be sited on private land where water resources can be re-allocated, for example, from growing alfafa and cotton to generating solar power.

3. Regarding the Notice of Proposed Withdrawal, I urge BLM to continue to allow public access and recreational use in the proposed solar energy study areas pending a final decision on the withdrawal application. This is particularly important where the proposed study area is located on lands that provide critical access for recreational uses and public enjoyment, e.g., the Gillespie solar study area.

TOPO! map printed on 09/13/09 from "Agua Caliente Road Area.tpo"

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Critical Access Route

Critical Access Route

Critical Access Route

Critical Access Route

Critical Access Route

Access Route

Access Route

Access Route

AGUA CALIENTE RD

AGUA CALIENTE RD

AGUA CALIENTE RD

Centennial Wash

Petterson Tank

Butte Mine

Black Butte

Idazona Mines

Jagow Tank

Webb Well

Hargan Mine

Webb Mountain

Buckeye Copper Mine

Poison Well

JEEP TRAIL

FENCE

ROAD

Map created with TOPO! ©2008 National Geographic; ©2007 Tele Atlas, Rel. 1/2007

112°57.000' W 112°56.000' W 112°55.000' W 112°54.000' W 112°53.000' W 112°52.000' W 112°51.000' W 112°50.000' W WGS84 112°49.000' W

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09/13/09