

Thank you for your comment, Gary Werner.

The comment tracking number that has been assigned to your comment is SolarM60229.

Comment Date: September 14, 2009 15:00:50PM

Solar Energy Development PEIS

Comment ID: SolarM60229

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Attachment: Solar_PEIS_&_SESA_comments_-PNTS_-14Sept2009.doc

Comment Submitted:

Partnership for the National Trails System

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September 14, 2009

VIA ELECTRONIC SUBMISSION

(<http://solareis.anl.gov/involve/comments/index.cfm>)

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

Re: Scoping Comments on the Solar Energy Study Areas and the Solar Energy Programmatic Environmental Impact Statement

To Whom It May Concern:

The Partnership for the National Trails System (Partnership) appreciates the need for the Bureau of Land Management (BLM) to systematically study and identify the most appropriate areas for solar energy development through the Programmatic Environmental Impact Statement (PEIS) and the specific Solar Energy Study Areas (SESAs). We further appreciate the stated intention by the BLM to minimize the impact of these developments on the array of natural, historical, and cultural resources on the public lands under its stewardship. Thus we strongly applaud and support the decision to exclude all units of the National Landscape Conservation System (NLCS), including the national scenic and historic trails, from areas to be considered for solar energy development.

We believe, as many others do, that all federal agencies, including the BLM, should work with other public and private entities to achieve significant reduction of energy use through greatly improved efficiency and conservation as a top national priority. Stabilization and reduction of energy use by government, corporations, and individuals -- as has been achieved in California for 30 years -- should be done before embarking on building vast new energy production systems on public lands. We also believe that BLM should play a role, with other federal agencies, in promoting and facilitating “distributive energy production” – the generation of energy through local technologies close to where the energy is used – rather than relying solely on large-scale energy production and transmission systems.

Once the SESAs are determined BLM should limit solar energy planning and development to those areas and close the rest of the public lands under its care from consideration for further energy development.

Interests of the Partnership

The Partnership for the National Trails System is a tax-exempt, non-profit federation of 34 non-profit organizations that work in direct partnership with Federal and state agencies to help sustain and manage

America's 30 national scenic and historic trails. The Partnership exists to foster information exchange among the trail organizations, to provide skill-building training for volunteers and staff, to coordinate their public policy advocacy, and to advise Federal agency managers about issues relating to the National Trails System.

The Partnership was incorporated in 2001 and received tax-exempt 501(c)3 status from the Internal Revenue Service in 2003.

Recommendations

While the Partnership is extremely supportive of BLM's decision to exclude all units of the National Landscape Conservation System (NLCS), including the national scenic and historic trails, from areas to be considered for solar energy development, we believe this decision needs further clarification in several ways.

First, unlike the other units of the NLCS, the national scenic and historic trails have not yet been given management boundaries or areas by the BLM, except in Wyoming. In Wyoming, for purposes of oil and gas development BLM defined a one-half mile wide special management corridor along the four national historic trails that cross the state. BLM severely limited energy development within this corridor and required stringent mitigation of visual and other impacts in areas along the national historic trails outside of that one-half mile wide corridor.

Recommendation: Until BLM determines special management corridors for all the national scenic and historic trails crossing lands that it manages SESAs should not be located in the vicinity of these trails.

Second, in much of the arid west the landscape is open for long distances providing recreationists and other visitors to the public lands expansive views. The units of the NLCS contain many of the most stunning and awe-inspiring vistas within the United States. Or, rather, they often contain the foreground and middle ground of such views, but do not include the background – the far and enclosing horizon. These long vistas uncluttered by human constructions are an essential aspect of the experience sought by visitors to these public lands. These views and the experience of them must be protected as essential for maintaining the integrity of the NLCS units.

It is common now to expect that congressionally designated Wilderness Areas should be kept free of human constructions so that the visitor can experience deep and expansive solitude and a sense of "primitive America." It is less well appreciated that visitors to the congressionally designated national scenic trails seek similar experiences of landscapes more natural than human dominated and that visitors to national historic trails seek authentic experiences of the historical "moment" or era of the trail they are visiting.

To preserve the historic and cultural resources associated with national historic trails it is not enough to protect the ruts, swales, buildings, inscriptions and other artifacts directly along the trails. Protecting these features alone without also preserving – and in some cases restoring – the setting or "context" of the artifacts makes it impossible for the scholar, interested citizen, or recreationist visiting the site to have an authentic and high quality experience of the historic "moment" for which it is purportedly preserved. Imagine trying to visualize the passage of hundreds of wagons and emigrants traveling to Oregon in the

1840s while standing at South Pass in Wyoming surrounded by fields of solar arrays or towering wind turbines.

Part of our natural and cultural heritage as Americans is our “wide, open spaces.” The experience of the uncluttered vastness of our land is part of the character of Americans. We must find ways to preserve opportunities for current and future generations of Americans to experience those uncluttered landscapes – not just in Wilderness Areas and national parks -- but also along national scenic and historic trails, wild and scenic rivers, and the other units of the NLCS. In the National Trails System Act authorization of national historic trails “high potential sites and segments” are recognized as the very best sections of these trails retaining the highest historical and cultural integrity. These “high potential sites and segments” – at the very least – should be accorded absolute preservation, not only of their artifacts, but also their essential setting – the landscape surrounding them.

Recommendation: The BLM should assess the viewshed from critical locations within all NLCS units – such as “high potential sites and segments” along national historic trails and vistas along national scenic trails – to determine areas outside those units that must be protected from development to preserve the essential character for which those units have been established. SESAs and future solar energy development should be excluded from those areas thus determined outside the NLCS units.

Third, the impact of construction activities associated with solar energy generation and transmission facilities on national scenic and historic trails is also a major concern. While exclusion of the SESAs from the national scenic and historic trails will presumably prevent direct impacts to them, indirect impacts by temporary construction roads and long-term impacts of transmission lines must also be avoided.

Recommendation: The BLM should stipulate that existing roadways be used to access SESA solar development sites and that transmission lines emanating from solar energy sites must follow existing transmission corridors.

Comments on Proposed SESAs

A. Arizona

The Partnership is concerned about possible direct and indirect impacts of the three SESAs to the **Juan Bautista de Anza National Historic Trail** and requests that BLM closely examines this potential and adjusts the SESAs accordingly.

B. Colorado

The Partnership requests that BLM closely examine the potential of the Fourmile East SESA to directly or indirectly affect the **Old Spanish National Historic Trail** and adjust the SESA accordingly.

C. Nevada

The Partnership requests that BLM closely examine the potential of the Dry Lake SESA to directly or indirectly affect the **Old Spanish National Historic Trail** and adjust the SESA accordingly.

D. Utah

The Partnership requests that BLM closely examine the potential of the Escalante Valley, Milford Flats South and Wah Wah Valley SESAs to directly or indirectly impact the **Old Spanish National Historic Trail** and adjust the SESAs accordingly.

Conclusion

Thanks for the opportunity to comment on the PEIS and the SESAs proposed for southwestern states. Please include the Partnership on all announcements, as well as all notifications associated with the PEIS process. We appreciate the opportunity to provide these comments and we look forward to participating further in this process.

Sincerely,

A handwritten signature in black ink that reads "Gary Werner". The signature is written in a cursive style with a large initial "G" and "W".

Gary Werner
Executive Director
Partnership for the National Trail System