

Thank you for your comment, Beaumont McClure.

The comment tracking number that has been assigned to your comment is SolarM60195.

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Solar Energy Development PEIS  
Comment ID: SolarM60195

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Attachment: Solar PEIS Letter FINAL.doc

Comment Submitted:

I am submitting a letter on behalf of the Public Lands Foundation President. See attachment.

September 9, 2009

Bob Abbey, Director  
Bureau of Land Management  
1849 C Street NW (WO350)  
Washington, DC, 20240

Dear Director Abbey:

This is in response to your request for comments on your joint Programmatic Environmental Impact Statement to Develop and Implement Agency-Specific Programs for Solar Energy Development (Solar PEIS).

The Public Lands Foundation (PLF) is a nonprofit national organization incorporated in 1987 to support keeping public lands in public hands, embracing multiple use management of BLM lands as prescribed by the Federal Land Policy and Management Act (FLPMA), and following sound environmental principles. We are a membership organization whose members are predominantly retired former employees of the BLM. As such, our membership represents a broad spectrum of knowledge and experience in public land management.

PLF supports the intent and the procedure for identifying the 24 areas in the six states (Arizona, California, Colorado, Nevada, New Mexico, and Utah) that are listed in the June 30, 2009 Federal Register as solar energy study areas to be analyzed in a Programmatic Environmental Impact Statement.

We have been concerned about the "Land Rush" by solar energy companies applying for sites on lands within the National System of Public Lands based on industry criteria and with little consideration of the potential impacts on other public values, and also with the industry intention that the first applicant for a site will have priority in getting the right-of-way permit for the solar energy facility.

We understand that the 24 areas listed in the Federal Register Notice have been identified by BLM as being relatively free of environmental conflicts and potential controversies and your intent is to have these 24 areas evaluated in the Programmatic EIS. The lands that are classified as suitable for solar energy production would then be made available for solar energy development through a competitive bidding process.

While the identified areas may have a low level of environmental conflict, that does not mean that important resource values are entirely absent. Wildlife habitat, watershed, and open space values can be adversely affected even in remote desert areas and consideration should be given to these kinds of impacts during the environmental assessment process. We believe the BLM should develop and implement an aggressive

mitigation program in partnership with the benefitting industries, local land users, and other citizens who use and care about our public lands. Considering that solar energy development can heavily impact large areas of land, mitigation measures, including off-site mitigation should be a strong component of the overall strategy.

Another aspect of the strategy we believe you should pay attention to as you proceed down this path is to be sure that the Federal government is not setting up a program that encourages private development on public lands to the exclusion of otherwise suitable private lands. Using public lands to subsidize the development of a particular industry can have long term impacts which are difficult to undo as private investments are made and communities are developed on the basis that these industries will be supported by the government even after their economic viability has passed.

That being said, we believe the proposed process will minimize conflicts with other public values and local concerns; will speed up the process of authorizing solar energy facilities on public lands; will help ensure that the public is getting a fair rental from the solar energy use of their public lands; and, if properly mitigated, could result in benefits to America's public lands.

PLF may have future comments about solar energy development on some of the individual areas, and, if so, we will express them during the PEIS process. Meanwhile, PLF endorses the approach BLM is taking in dealing with the solar energy initiative on the National System of Public Lands.

Sincerely,

/s/ George Lea

George Lea, President

Identical letter to:

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