

Thank you for your comment, Joe Ross.

The comment tracking number that has been assigned to your comment is SolarS50022.

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Solar Energy Development PEIS
Comment ID: SolarS50022

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Hello:

Regarding issues that need to be addressed ...

Please refer to Section 102(2)(B) of NEPA (along with 40 CFR 1502.23) that deals with "cost-benefit analysis." I hope to see diligent analysis focus on these areas for economic analysis:

- ** cost & revenue analysis
- ** value analysis
- ** decision rules
- ** behavior predictions
- ** budget & fiscal impacts
- ** economic activity impacts
- ** economic & social structural changes associated with solar energy development

I would also like to see the impact to wildlife (specifically avian species) addressed associated with "tower-kill" (esp. when such technology as the power tower is used).

Regarding development of reasonable alternatives ("practical or feasible from the technical and economic standpoint and using common sense"), I'd like to suggest an additional one for analysis. Because these areas within the six states have become so heavily allocated for land uses, I would like to see an alternative that also analyzes the potential for compatible solar development in areas that are currently not available for such development. This would include designated wilderness areas where flat terrain exists and where visitor use statistics may indicate that the undesignation of wilderness (and associated energy development) may be in the national interest (based on the president's priority agenda and Executive Order).

Further, such an alternative should document and analyze opportunities to work with the various military services that have large acreages of withdrawn lands in arid and desert areas. This alternative would identify opportunities for compatible development on areas already allocated or withdrawn for other uses. I have a gut feeling that potential for such compatibility may exist, and the BLM and DOE should make stronger efforts to coordinate with the wilderness, wildlife advocates and DOD for full use of wilderness and military lands to optimize solar energy development where it can co-exist with other uses.

I feel that additional utility corridors should be minimized, and the EIS should clearly establish (perhaps with varying alternatives showing the range of impacts) by using existing corridors vs. development of new ones.

The impact analysis should also differentiate between technologies that use water-cooled vs. air-cooled systems. A question to be answered is: how can the policies subsequently developed be written to encourage a less-impacting technology over one that is more adverse in nature?

With the fast growth of this industry (and related technology), I also question if your 20-year timeframe is appropriate. I believe that a better planning cycle/horizon might be 10 years, and I would like you to consider this for your programmatic analysis period (with the option to update or supplement in the future if needed).

I encourage the promulgation of Memos of Understanding between BLM and local water districts to incorporate best mngmnt. practices into all forms of energy development.

Please put me on your mailing list for a hard copy of the programmatic EIS. Please note that these are all my personal views and do not represent any views of organizations with which I am associated.

Thanks very much.
Joe Ross
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