

Thank you for your comment, James Hanley.

The comment tracking number that has been assigned to your comment is SolarS50135.

Comment Date: July 7, 2008 16:26:09PM
Solar Energy Development PEIS
Comment ID: SolarS50135

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Attachment: solar energy PEIS scoping comments.doc

Comment Submitted:

[See Attachment.](#)

Solar Energy Development Programmatic Environmental Impact Statement

Scoping Comments

1. In the Purpose and Need chapter discuss the existing western electricity transmission system. In particular, the study should provide background information on cost, reliability, redundancy, congestion, and future electrical energy demand.
2. Discuss some of the existing challenges to federal right-of-way authorizations for solar energy development.
3. Solar energy development should avoid affecting sensitive resources, monopolizing land use, and conform to existing regulatory constraints to the fullest extent possible.
4. Consider using a systematic, three-step siting process as was done successfully in the Westwide Energy Corridor PEIS study process using environmental, engineering, and land use screening criteria to reduce potential environmental and land use conflicts. Step 1. Develop an unrestricted conceptual solar energy project infrastructure that addresses solar energy supply with no consideration of regulatory or environmental restrictions or constraints. Step 2. Locate preliminary leasable solar energy tracts on federal lands such that major known, sensitive, or important resources and land uses are avoided. Step 3. Refine preliminary solar energy area locations so they are consistent with local federal land management responsibilities and further avoid sensitive resources to the fullest extent possible.
5. The PEIS should study how procedures to expedite the application process for solar energy related projects would impose project-specific and cumulative environmental impacts.
6. The PEIS should examine the ESA Section 7 effects of designating federal land and amending land use plans for solar energy development on listed species and critical habitat.
7. The PEIS should examine a broader range of alternatives than the three proposed alternatives, i.e. no action, preferred alternative, and BLM limited development option. In addition to designating solar energy development on prospective federal lands, another alternative would be to site solar energy development projects on private, urban, and industrialized land, including the use of existing building rooftops.
8. In addition to this range of alternatives, the PEIS should study environmentally neutral alternatives that call for increasing energy efficiency or conservation by energy users instead of promoting additional solar energy sources of supply.
9. The scope of the analysis in the PEIS should include an assessment of any positive and negative environmental, social, and economic impacts of the alternatives. The Agencies should examine the direct, indirect, and cumulative impacts of solar energy development on the natural environment, social systems, and the economy. The analyses in

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preparation of the PEIS should be based on current, available, and credible scientific and engineering information.

10. In the Alternatives chapter, discuss other alternatives that were considered but eliminated from detailed study in accordance with the implementing regulations of NEPA. A summary comparison of the environmental consequences of the analyzed alternatives should be presented in this chapter as a convenience to readers.
11. Environmental analyses of solar energy projects proposed under the Proposed Action should tier to this PEIS for their environmental analyses, and project applicants should be required to do additional project-specific environmental analyses as required by NEPA and other applicable laws.
12. The PEIS should consider using existing federal statutes, regulations, and policies (e.g., Wilderness Act of 1964) to avoid considering solar energy projects on Federally and state designated wilderness areas, near wild and scenic rivers, and conflicting with the scenic vistas provided by our national parks, national monuments, national recreation areas, national wildlife refuges, roadless areas, and national natural landmarks. In addition, the PEIS should consider avoiding resources that are ecologically, culturally, scientifically, educationally, and/or recreationally important when accepting applications for solar energy projects. Examples of such important resources include wilderness study areas, national conservation areas, areas of critical environmental concern, special recreation management areas, national historic trails and national scenic trails, important cultural and historic properties, national historic landmarks, world heritage sites, research areas, experimental forests, and important paleontological resources.
13. The federal land management agencies would adopt an appropriate common set of operating procedures when evaluating solar energy ROW applications. A common set of procedures would assist the agencies, project applicants, and others in evaluating applications. Consideration of information generated by implementation of the common procedures would help ensure that solar energy projects are planned, implemented, operated, and eventually removed in a manner that protects and enhances environmental resources. In addition, the adoption of common procedures and regulatory requirements, such as the Endangered Species Act of 1973, should be mandatory and should be required for all proposed projects at all solar energy locations.
14. Finally, a summary table of potential environmental impacts from generic solar energy projects on federal lands, including amending federal land use plans to specifically provide for solar energy ROW authorizations, should consider explicitly the following range of resource values: land use, geologic resources (fluid and solid minerals), paleontologic resources, water resources, air quality, noise, ecological resources, visual resources (i.e. scenic vistas), cultural resources, tribal traditional cultural resources, socioeconomic resources, environmental justice, and public health and worker safety.