

Thank you for your comment, Christopher Lish.

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Solar Energy Development PEIS
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I strongly urge the Bureau of Land Management (BLM) to develop strong environmental guidelines for utility-scale solar energy development in Arizona, California, Colorado, New Mexico, Nevada and Utah that will ensure that our wildlife and wild lands are protected for future generations. These western states provide great potential for cultivating renewable resources on public lands, and solar energy production will help reduce the degradation to our valued landscapes that is resulting from global climate change. I fully support the BLM and Department of Energy (DOE) in creating a program for the development of solar energy. However, the significant and long-lasting impacts of concentrating solar power plants require a hard look at potential sites to find the places where the footprint has the least impact.

"Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish-indeed, all the living creatures of prairie and woodland and seashore-from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement."
-- Theodore Roosevelt

Americans are finally recognizing that our energy needs are continuing to grow and that our future depends on finding sustainable ways to meet those needs, free ourselves from dependence on foreign energy suppliers, and reduce our reliance on energy sources that contribute to global warming. But it's important that we protect the natural value of our southwestern lands and the wildlife that lives there as we pursue renewable energy development.

A single solar energy plant can cover thousands of acres and must be built on land with less than a 3% grade and completely bare of plants and animals. When land is graded, all living things are either displaced or destroyed. That's why it's so important to choose site locations wisely.

Our Southwest deserts are fragile ecosystems that provide vital habitat for wildlife, including species -- like the desert tortoise -- that are currently protected under the Endangered Species Act. Large, interconnected intact habitats are vital to preserving the rich biodiversity of our deserts. Decisions about where to build solar energy facilities and how to transmit the electricity we need to power our cities will affect more than a million acres of land -- and the imperiled wildlife that depends on these lands to survive.

This Programmatic Environmental Impact Statement (PEIS) is a great opportunity for the BLM and the DOE to make sure solar energy is done right in the West. The same landscapes that make utility-scale solar energy possible are often the ones that are most at risk from the impacts of climate change and in need of protection.

I strongly support the Bureau's current policy to protect certain public lands from solar development. To ensure preservation of our wild lands, the scope of the PEIS should include the following:

- * Prioritize projects on already-degraded lands.
- * Areas where solar development is not permitted should be identified in the BLM plans and be included in the DOE's policies. In addition, the agencies should come up with a more complete list of important and sensitive lands to be protected, including, but not limited to: other identified conservation lands, such as national parks, national monuments, state parks; state-designated and

citizen-proposed wilderness areas; areas already proposed for protection from development in pending legislation; wildlife migration corridors and designated and potential critical habitat for federally- and state-protected species; Important Bird Areas; all Areas of Critical Environmental Concern; and areas with known concentrations of cultural resources.

- * Establish mandatory best management practices and development stipulations.

- * Explore mitigation measures for environmental impacts, including cumulative impacts and detailed habitat fragmentation analysis.

- * Establish a policy for incorporating site-specific projects with existing transmission and transmission corridors.

Furthermore, the BLM should make it a top priority to approve non-controversial solar projects that have already been proposed and continue accepting and processing solar applications in non-controversial areas on a case-by-case basis during the PEIS process.

Southwest deserts are already under considerable pressure because of off-highway vehicle use, development, pollution, and water shortages. The Bureau should take into account how solar development projects, and, in particular, multiple projects, could compound these existing problems if they are not developed in the most sustainable manner possible.

Specifically, I urge the Bureau to incorporate landscape-level and cumulative analysis into its application review process. Proposed development sites do not exist in isolation. In an effort to monitor the overall health of our sensitive desert ecosystems, the Bureau should consider existing and foreseeable projects and environmental problems when reviewing all applications.

I support renewable energy and think that solar energy can move forward. But with our energy needs so high and so many solar projects in the queue, we need strong policies in place to minimize negative environmental impacts and protect our public lands and wildlife for future generations. With careful planning, our energy future -- and the future of our wildlife -- will both be more secure.

“A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”

-- Aldo Leopold, *The Conservation Ethic*

Thank you for the opportunity to comment on the Solar Energy Development PEIS and for considering my views on this incredibly important topic.