

Thank you for your comment, John Moody.

The comment tracking number that has been assigned to your comment is SolarS50368.

Comment Date: July 14, 2008 14:01:15PM
Solar Energy Development PEIS
Comment ID: SolarS50368

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Attachment: Solar PEIS (Scoping Comments).doc

Comment Submitted:

Desert Survivors is providing the attached comments to assist you in scoping the Solar PEIS. We will also provide the same comments to you in letter format, sent today July 14, 2008.

[See Attachment.](#)

Desert Survivors
P.O. Box 21143
Oakland, CA
94620-1143

July 14, 2008

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

Dear Sirs:

Desert Survivors is providing the following scoping comments for the Solar Energy Development Programmatic Environmental Impact Statement (PEIS) noticed in the Federal Register on May 29, 2008 and as briefed at the joint DOE and BLM Public Scoping Meetings held in June and July 2008. These comments are meant to assist you in developing your plans. We request a public response to these comments and that they are addressed in development of any future project design or PEIS process.

Desert Survivors is a non-profit public-benefit desert conservation organization based in Oakland, California with over seven hundred (700) members. Desert Survivors performs educational and conservation activities on both public and private lands in the project area covered by this PEIS. Desert Survivors' educational and conservation activities on these lands will be impacted by decisions taken as a result of this PEIS. Likewise as citizen/members we will also be personally affected by the decisions taken as a result of this PEIS. As a registered public-benefit corporation, Desert Survivors wants and needs to be included in the PEIS decision making process, as defined by our nation's laws.

We believe that the alternatives identified in the briefing material fail to adequately identify alternative ways of meeting the goals, purpose and needs identified by the agency and that they need to be better articulated before the PEIS process continues.

The DOE briefing material identifies DOE goals as; 'Add energy supply from diverse sources...', and 'Improve the quality of the environment by reducing greenhouse gas emissions and environmental impacts to land...' The Solar Program Goal is stated as; 'Increase the use of solar power'. It is assumed that these are also the goals of the program and/or project(s) for which the PEIS is proposed. Several problems with these goals immediately come to mind:

- a. The proposal is to support utility scale (10,000 mw) projects and the PEIS seems focused on that end. It appears that DOE has already narrowly focused its efforts on large scale desert projects and does not address small scale community or property owner based projects. DOE has not identified or analyzed the full range of alternative ways

of meeting its purpose. Any PEIS must address, analyze and compare the many solar alternatives available to meet the agencies stated goals and purpose.

- b. It is unclear too if the proposed agency action is to facilitate a single utility scale project by 2015 or to open almost the entire Western Desert to projects. If a single project is intended then a PEIS is not needed and BLM should conduct a project specific EIS. BLM already has 600,000 acres under application for solar projects in CA alone. Is the purpose of the PEIS to streamline BLM in its regulatory requirement to conduct environmental reviews for projects on its land? If the intent is to streamline or accelerate BLM legal requirements, is not DOE's funding or lead on this effort contrary to Congress' intent by law and budget for BLM?
- c. The purpose, scope and goals of this agency action have not been adequately identified to allow for meaningful public participation. It appears that the decisions have been made and that the agencies are merely attempting to meet the letter of the law. Much wider discussion, debate and public participation is needed before project specific scoping of any PEIS or EIS occurs.
- d. Likewise, the material appears to indicate that DOE has disregarded any but the most efficient publicly owned solar collection areas. While the legal requirement for federal agencies may only require the NEPA process for their actions on public lands the potential scale and environmental impact of numerous 80 square mile, 10,000 mw plants, scattered throughout the western deserts amounts to a national energy effort of tremendous size and scope. DOE should not limit its focus to just public lands but to private, state and community lands in its search for appropriate locations and analysis for adverse environmental impacts. It may very well be in the best interest of the nation if massive solar collection plants were located on both public and private lands in close proximity to end users of the power. Additionally, more decentralized private and community solar collection capacity must be a major component of any such large scale alternative power development program. The PEIS level analysis of the environmental costs should cover public, private and community owned lands.

Any energy project intended to 'Improve the quality of the environment...' must be imbedded in an energy policy that also calls for a significant reduction in all types of energy use. This does not appear to be the case. The PEIS for this project must address the environmental impacts of current and anticipated levels of all energy use by this country and demonstrate how this project will reduce both the overall use of energy, its negative impacts and how it will improve the environment. Merely adding an additional source of energy to an already harmful energy program is not 'Improving the quality of

the environment...’ If the purpose of the project cannot be met then the PEIS should be scoped to demonstrate that.

The PEIS needs to address the issue of global climate change. Not in a superficial manner as in, “Solar is good, carbon is bad.” Rather, it needs to address in detail how the project may or may not affect large scale weather patterns, and how it will affect regional and local weather patterns. This analysis needs to be down to the specific mountain chain and basin level. Additionally, it should address all identified or anticipated biotic communities such as sky islands or closed basins. This analysis should not only address anticipated direct impacts but future impacts evolving as current weather patterns continue or change. As an example, if the current western trend of warming and drying is expected to continue the many habitats and species ranges will change. Will the proposed projects adversely affect the ability of species to naturally adjust to such environmental changes? Will the project or projects impact the ability of species to move freely through out the inter-mountain West? The scope of any PEIS should address these future macro potential impacts as any project specific EIS would address more local concerns.

The impact on current and future water resources needs to be addressed in great detail. Most of the groundwater available in the proposed project area is fossil water with little to no recharge, and is often highly charged with minerals. Additionally, most of the communities in the proposed areas are dependent upon groundwater for drinking and irrigation, while most of the wildlife is dependent on surface or near-surface interface waters. How the project will potentially effect these critical resources must be addressed in detail. Not only should groundwater depletion and surface water capture be addressed but the impacts of returned waters on the desert landscape and biotic communities must be addressed. Studies in southern AZ have demonstrated that irrigation of desert biotic communities with groundwater leads to a significant reduction in germination as compared to rain water. Thus water extracted for cleaning or steam operations might need to be purified before it is returned to the environment. Depletion of surface or groundwater also might lead to air quality problems as wind erodes newly desiccated land features. Any PEIS must address all of these issues and the many more that will result from any new or increased water use for this project.

Many of the basins and ranges of the study area function as migration corridors and locations for various species, these need to be addressed; not only the seasonal thru movement of species but the local movement of species within the proposed areas.

The western deserts support many migratory, endangered, threatened and listed or unlisted species of concern which need to be addressed specifically, as too their current and potential future habitat needs. ESA Section 7a1 and Sec 7a2 require consultation with the FWS, and possibly with NMFS for Salmon stock in northern NV. This should be addressed in the PEIS.

All designated Wilderness Areas, Wilderness Study Areas, or other potential special areas of concern need to be specifically addressed along with any private conservation holdings and potential wildlife corridors between them.

The effect of new or expanded energy corridors and infrastructure needs to be addressed in detail. Alternatives to long range transmission of energy need to be addressed. Establishing generation in close proximity to end users is less harmful to the environment and connects communities to the benefits and impacts of their energy use. Thus incentive to reduce harm and use are increased. Cheap energy for maximum corporate profit is not improving the environment, it is harming it.

At one point in the Sacramento presentation mention was made that the utility scale projects might have an economic or technical lifespan of less than 50 years (we think the figure of 30 years was used). The PEIS must not only address construction of the project(s) and their long term operation, but it should address closure and restoration. Desert restoration may not even be possible, while the damage done is know from experience to remain highly visible for many, many generations of men. The long term destruction of otherwise healthy landscapes for temporary energy consumption is not acceptable. Use of already degraded lands, even if not the most efficient for solar collection would be the more environmentally sound. Use of already degraded military lands or the former nuclear test areas should be considered as lower impact options. Additionally, the use of former and current low grade agricultural lands of the southern central valley of California, the salt impacted cotton fields of Arizona or the roof tops of the LA and Las Vegas would be more protective of the environment than use of distant new-ground and should be considered. We are talking here of mitigation efforts, while the DOE stated goal is to ‘Improve the quality of the environment...’ There seems to be a real disconnect between the purpose and goals of the project. Before any PEIS is begun these disconnects need to be addressed, and the PEIS should be designed to quickly identify and address such contradictions.

The options addressed in the scoping material are wholly inadequate. There are many significant alternatives and variations available to address DOE’s purpose and goals. The PEIS process should be withdrawn until meaningful alternatives are offered and vetted with the public and stakeholders. A meaningful stakeholder and public participation forum (such as community advisory groups) and process should be established to address the goals and purposes of the project before the PEIS process is restarted. The potential impacts of this project are too significant to streamline. DOE can, and with much public and scientific support state that alternative energy is critical for our nation’s future. But, it cannot justify a rush to blade the desert for industrial size commercial ventures as immediately necessary. The timing of the current process supports just such an approach.

Desert Survivors wishes to participate in any stakeholder or community outreach forums supporting desert focused Solar Energy Development programs or projects. Additionally, Desert Survivors wishes to be added to any outreach alert or mailing lists that will help it more actively participate in the process of assuring that our future energy security does not harm the very desert lands we seek to protect.

Thank you for soliciting our thoughts, comments and questions. We hope that our comments help you to 'Improve the environment...' or at least protect it. If you have any questions regarding these comments please contact me at the above address or call me at (707) 829-1689.

Respectfully,

John R. Moody
Director at Large