

Thank you for your comment, Steve Saway.

The comment tracking number that has been assigned to your comment is SolarS50427.

Comment Date: July 14, 2008 21:51:33PM
Solar Energy Development PEIS
Comment ID: SolarS50427

First Name: Steve
Middle Initial:
Last Name: Saway
Organization:
Address: 533 Suffolk Drive
Address 2:
Address 3:
City: Sierra Vista
State: AZ
Zip: 85635
Country: USA
Email: stevesaway@gmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Comments on Solar Energy PEIS.doc

Comment Submitted:

[See Attachment.](#)

Comments on solar energy PEIS:

1. Alternatives. The solar energy development alternatives planned for consideration in the PEIS have an underlying premise which is that the projects should be evaluated for siting on public lands via rights-of-way (ROWs) granted by BLM. Under these scenarios, BLM would assume a large and significant management role to administer the ROWs and monitor compliance with terms and conditions. I suggest that a fourth alternative be explored whereby public lands (as appropriate) are identified for disposal and sale to the private sector for solar energy development, i.e., a private sector alternative. The BLM has authority under the Federal Land Policy and Management Act (FLPMA) to do this. (Note: Under this alternative, ROWs required for electrical transmission lines and corridors would continue to be sited on public lands.) This fourth alternative would allow the BLM to determine through a public process which lands should be set aside for disposal and sale for solar energy development. In this way, the competing land uses and their values (recreation, grazing, wildlife habitat, natural resources, watersheds, etc.) can be analyzed and factored into the decision for disposal. Also, it would allow private property owners (such as owners of agricultural lands) to compete for solar energy projects and not be marginalized by the use of “free” public lands. Arguably, if solar energy facilities envisioned by the PEIS require an exclusive use of public lands, then what is the value of retaining these lands in public ownership? A large-scale solar energy utility in effect denies the use of public lands for recreation, grazing, wildlife, and natural resources. BLM would not be able to comply with the policy set forth in FLPMA (Title I, Sec 102, para (8)) to manage public lands for their natural resource values and multiple use.

2. Mitigation of Environmental Impacts. I recommend the PEIS address a specific requirement for selective salvage and transplant of native plants that are removed during surface-disturbing activities. For example, a recent situation occurred in Arizona where a right-of-way development was resulting in destruction of pristine Saguaro cacti on BLM lands. It was only due to public pressure that some salvage was attempted. This requirement should also apply to native wildlife species whose habitat is disturbed (such as the desert tortoise). In addition, the critical scarcity of ground-water resources in the West must be fully considered when evaluating the suitability of the various types of solar energy facilities.

3. Evaluation of Public Lands Suitable for Solar Energy Facilities. The PEIS envisions a Facilitated Development Alternative which would identify public lands with high solar energy development potential, including the designation of lands suited for competitive leasing if applicable. Under this scenario, I recommend that an economic analysis be included that compares the present value of net solar energy benefits with the present value of public land benefits that are foregone due to exclusive use of public lands for solar energy development. Such benefits foregone would include as applicable: the socio-economic benefits of grazing and recreational activities (and their importance to local rural communities); the benefits of healthy watersheds, ground-water resources, and scenic landscapes; the benefits of open spaces, natural resource values, and undisturbed wildlife habitat; and the sustainability of public land values for future generations. The decision to forego the public land values envisioned by FLPMA must fully consider the benefits to society that these lands provide. Though the PEIS will not include lands within the National Landscape Conservation System, this does not in any way mitigate the potential loss of thousands of acres of other BLM managed public lands with high resource values. In my view, the diversion of public lands for exclusive use by solar energy utilities will set a huge and lasting precedent and should not be done without full and open consideration of the significant benefits lost to the American public.