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Comment Date: July 14, 2008 23:06:16PM  
Solar Energy Development PEIS  
Comment ID: SolarS50445

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Middle Initial: [Withheld by requestor]  
Last Name: [Withheld by requestor]  
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## Solar EIS Comments

1. Why is the BLM doing a PEIS when they already have 100+ applications to process? Each of these is going to require a separate EIS and this will take an incredible amount of time. The purpose of the PEIS is supposedly to save time and develop similar guidelines. If all 100+ applications are processed before the PEIS is completed, what time is that going to save? It sounds like an additional amount of money that is wasted.
2. I don't really want my taxpayer money spent on a PEIS. Each individual EIS should be paid for by the solar applicant. Given the above two statements and knowing that the PEIS will probably go forward despite my concerns, I will submit relevant comments.
3. More alternatives are needed. One alternative should consider development on non-public lands as an option.
4. Another option should consider placing solar arrays on large rooftops (malls, industrial buildings) and parking garages, and giving businesses and individual tax credits for installation of systems.
5. The PEIS needs to consider each type of system separately. Some may be appropriate for some areas and not in others.
6. The water needs of each type of system should be carefully analyzed. The desert Southwest cannot support additional demands on its water supply.
7. The BLM should look first to previously disturbed lands such as abandoned mine lands and old agricultural fields.
8. Can solar arrays be located in the same areas as wind turbines to reduce amount of land disturbed? Could panels actually be placed on the turbine towers?
9. Will the concentrator-type facilities actually heat the air around them, resulting in additional global warming?
10. Will each of the sites be exclusive use to the solar energy companies? Will public recreation (hiking, hunting) and grazing be restricted?
11. Rights-of-way for these projects should be approved only at fair market value compared to similar development on private land. If sites will be exclusive use and public not allowed into them, fees should be higher since taxpayers will lose use and enjoyment of those lands.
12. PEIS should mandate that site-specific applications for solar facilities that are tiered down in the future must include all necessary infrastructure so that those needs can be assessed along with the site itself. This includes agreements with power transmission companies.
13. As the PEIS is developed while the 100+ EISs are being prepared, each of those project leads should submit lessons learned from their projects so that these can be incorporated, as appropriate, into the PEIS.
14. If vegetation is removed from the entire site, what dust abatement will be required?
15. If soil stabilizers are used, there will be no vegetation, hence no habitat for wildlife.
16. It seems like the type of systems that are on raised poles offer the least amount of surface disturbance and possibly some benefits from shading vegetation beneath them.

17. The BLM will certainly refrain from allowing solar projects in National Monuments, National Conservation Areas, Areas of Critical Environmental Concern, Wilderness, Wilderness Study Areas, and Wild & Scenic River corridors. It also needs to consider the “viewshed” of all of the above, and should also consider vistas from nearby National and State Parks, National Forests, and FWS Refuges.
18. No solar projects should be allowed in critical habitat for any endangered or threatened species.
19. The BLM needs to explain how the development of solar power will actually reduce greenhouse emissions. Once solar comes online, will coal and gas-fired utilities be taken offline? Otherwise, where is the reduction?