

Thank you for your comment, Bill Broyles.

The comment tracking number that has been assigned to your comment is SolarS50463.

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Comment Submitted:

I appreciate that the Department of Energy and the Bureau of Land Management is developing an EIS to evaluate solar development and hopefully will develop guidelines for allowing and disallowing solar development on BLM lands.

I am very supportive of developing alternative energy sources.

However, I am very concerned about the allowing utility-scale solar development on public land. All of the documents that I have seen indicate that this type of solar development will completely eliminate the use of this public land for any other purpose. This land is designated as multiple use, and is the public's land. People use public land for recreation, and it is important for maintaining wildlife habitat. If solar development is allowed, the public will no longer be able to use their public land. I do not believe it is in the best interest of the public to allow solar development on public land. DOI must require corporations to pay fair market value for public lands, which likely will relieve pressure on public lands and channel corporations to vacant private lands, such as sterile or feral farmland, mall rooftops, abandoned airfields, or unused parking lots. Integrating solar power facilities within communities, instead of distant or remote sites, should be a priority.

The EIS should include an alternative that disallows use of public land for solar development. In this alternative, the ability to develop utility-scale solar industry on private lands should be evaluated. Also, the ability to generate solar power from solar panels on rooftops should be evaluated, so that wildlands do not have to be lost. Lands that are already disturbed, such as abandoned mines and landfills, would be appropriate for solar development.

From what I've seen, solar fields are bladed of all vegetation and sterilized to prevent new growth. This eliminates the land from having its natural functions and values, such as habitat for a wide variety of species, recreation and hunting, rainwater percolation for aquifer replenishment, seed banks for native plants, connected habitat for mobile or migratory species, and public enjoyment. Problems may include increased dust and erosion, air pollution, wildlife mortality, public inaccessibility to other public lands, and contamination of soil, air, and ground water. The elimination of vegetation is counterproductive to the reduction of greenhouse gases and oxygen replenishment.

If public lands are used for solar development, placement of the solar development is critical. All sensitive public lands should be eliminated from solar development, including lands with important wildlife habitat and endangered species, riparian areas, National Conservation Areas, Wilderness Areas, Wilderness Study Areas, Resource Conservation Areas, National Monuments, National Conservation Areas, Wild and Scenic Rivers, and National Historic and Scenic Trails. Lands appropriate for solar may include BLM lands identified for disposal.

The EIS should evaluate how much water will be required for utility-scale solar development. The water use should not withdraw water that is needed for other land values, including instream flows necessary for wildlife.

I am also concerned about the recent decision to allow some permits to be evaluated and approved before the EIS is completed. I am concerned that some permits will be approved in places that are inappropriate, before the analysis is completed.

I fear that this “solar rush” can be motivated for reasons other than alternative energy, and may become a land grab or charade to snag energy subsidies. If lands are turned over to private entities, by sale or lease, terms must be imposed that require the project be solar only and be completed (not diverted for other uses). We must not let solar become a bait and switch boondoggle.

If public lands are offered at fair market value with strong environmental protections, I suspect that private corporations will realize the value of abandoned or spent farmlands, for they are already leveled, likely come with water rights, and have clear title.

I suggest that all public land appropriated for solar remain in public trust and not be transferred to private hands. Further, at the end of the project’s life or if the project is abandoned, the land shall revert immediately to the public and the company must rehabilitate it to natural its state (as documented prior to the project).

Foremost, planners must continually remind themselves that a desert is not a wasteland. Healthy desert has many ecologically important functions and values, values that are diametrically incompatible with barren earth as required by a solar farm.

In sum, solar may become a valuable alternative source of energy, but we must vigilantly protect the full functions and values of our public lands.

Please keep me posted on further developments and opportunities to comment.

Thank you,

s/ Bill Broyles 5501 North Maria Dr. Tucson, Arizona 85704