

Thank you for your comment, Denis Trafecanty.

The comment tracking number that has been assigned to your comment is SolarS50602.

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Solar Energy Development PEIS  
Comment ID: SolarS50602

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Attachment: Solar PEIS Letter 07\_08.doc

Comment Submitted:

See my letter dated today.  
this letter should be put together with the attachment attachment on the San Diego Smart Energy 2020 Plan. This attachment and letter dated today from me should be put together to form my complete comments.

Denis Trafecanty  
760-703-1149 [See Attachment.](#)

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July 15, 2008

Solar Energy Development Programmatic EIS Scoping  
Argonne National Laboratory EVS/900  
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Executive Summary

Thank you for allowing the public to comment on this PEIS. I believe that there are many issues to be further studied before the US DOE and the BLM give any serious consideration to allowing developers and utilities to develop large scale solar projects on our public BLM lands. These large projects will only add to the cost of producing renewable energy as in most cases large scale solar projects will require additional transmission lines to get the renewables to the major metro areas. No matter what solar technology you use, the cost for large scale solar projects will far exceed the cost of any solar development in metro areas. Attached to this letter is the San Diego Smart Energy 2020 Plan issued in October 2007, authored by Bill Powers and funded by the San Diego Foundation. This Plan shows how a large Metro area like San Diego can avoid billions of dollars of cost to California ratepayers by the use of In Basin generation of renewables. I like to call it DGNN, which is Distributed Generation Near the Need.

Why donate the use of our precious public lands for large scale solar projects when we have many major landowners and building owners who would be willing to consider leasing their lands or buildings for solar projects? By offering our public lands to investor owned utilities and developers at little or no cost, you are squeezing out the private building owners and landowners from the possibility of realizing a profit from their building or land ownership.

## Discussion

Damage to our Protected Lands – Any large scale utility solar projects many miles from metro areas will most likely require transmission lines. Undoubtedly these lines will encroach on State and National Parks, Monuments, National Forest lands, Tribal Lands, Preserves, Wildlife Conservancies', and private lands which have been designated by local jurisdictions as "no growth" and have been kept by Private Landowners in their natural state. These lines will be a threat to our wildlife, including the endangered Big Horn Sheep, the Bald Eagle and the Golden Eagle.

Reduced Reliability – Energy reliability is sacrificed by using transmission lines through fire prone areas to get energy to the marketplace. We are in the midst of many fires out of control in California today. These lines will need to be shut down during the fires. And some of those fires will be started by transmission lines. At least three of the fires in San Diego County were caused by transmission lines in the catastrophic October 2007 firestorms.

Reduce our Dependence on Foreign Oil – It was said in your Riverside Scoping meeting by one gentleman that we need to bring our soldiers back to this country and we can do this by reducing our dependence on foreign oil. And this gentleman said that large scale utility solar projects can be a means to accomplish this goal. I have heard some reports that our country is spending about \$1 Billion per day to fight the wars in Iraq and Afghanistan. Let me submit to you another approach. Why don't we change the compensation structure for our large utilities (they currently get over 13% profit margin for construction of steel in the ground transmission lines plus the profit from on going operating costs), pull back from the war effort, and use that money to develop In Basin residential and commercial rooftop and parking lot projects and other forms of in basin Distributed Generation? By my simple calculations, assuming a cost of \$25K for residential rooftop solar (my Wife and I have rooftop solar at our residence), with one billion dollars per day we can put solar on 40,000 homes per day! And go ahead and charge these homeowners for their

energy consumption at the same or a lesser utility rate. Now how fast can we reduce our dependence on foreign oil that way?

Affordability of In Basin Solar Generation – There is no way that it will be more cost effective to build large scale utility solar farms in remote areas when you need to add steel in the ground to get that energy to Market. California ratepayers will be required to spend larger sums of money to not only pay for the development of large scale solar, but also to pay for the transmission lines needed to move the energy to major markets. It is a simple calculation that shows DGNN (Distributed Generation near the Need) will be more affordable to our ratepayers. That fact is further evidenced in the San Diego Smart Energy 2020 Plan that is attached to this letter.

Terrorism Threats – There is a much greater threat of terrorism if energy in any form is imported from remote areas. For example, in San Diego and Imperial counties, the Imperial Valley sub station has energy going through it from dirty fossil fuel plants owned by a Sempra Subsidiary in Mexico. In addition, the Imperial Irrigation District has transmission lines going through this substation and SDGE (also a Sempra subsidiary) is contemplating another transmission line to be connected to this substation. In the event of a terrorism attack, a significant percentage of San Diego metro energy will be compromised. A better approach is DGNN (Distributed Generation Near the Need). There is minimal terrorism threat with in basin solar generation.

Balanced Ecosystem – Just like the Amazon rainforests, the Desert in the Southwest USA is part of a balanced ecosystem on this Earth. Changing up to one million acres of our desert southwest must be studied extensively before any of our public lands are damaged further. My understanding is that one million acres is over seven percent of the BLM lands available to the public in the desert southwest. This ecosystem destruction will result from construction of the large scale utility solar projects and transmission lines. These areas will be further eroded by with boots and tires during all phases of the project (construction, operating maintenance and the unauthorized use by recreational users). This will stare out native vegetation with serious effects to the food chain for those that raise cattle.

Our Private Landowners and Building Owners – By approving this project, you would be benefiting the few (investor owned utilities and developers) at the expense of our ratepayers. You will be side stepping the whole issue of the existing landowners and building owners. You know that the utilities will ignore any possible solar development from our property owners when and if you offer large scale solar projects to the utilities and developers.

What Will New Transmission be Carrying? - What is the real intent of the utilities? Do they really care if the non commercial projects like Stirling Solar Systems are successful? Or are they chomping at the bit to run dirty fossil fuels through those new but archaic transmission lines? In the case of San Diego metro, we already know that SDGE's parent, Sempra, has a dirty fossil fuel plant in Mexico, just across the border. We also know that they have a massive LNG plant just further southwest of this plant near Rosarita. They are positioned to transport these dirty fuels from far eastern countries, and you can be certain, if these lines are built, that any newly proposed transmission will by carrying these dirty fuels to the major markets north of San Diego

### Summary

I believe this proposed PEIS is a bad idea for our environment. I believe it to be a windfall profit for our investor owned utilities and developers both foreign and domestic. Further, our property owners and land owners will be ignored as they desperately try to make a living from their land. Don't destroy our parks, our forests, our preserves, the private lands that we preserved for generations and the tribal lands. Don't take our homes, poison our lands and darken our skies. Don't threaten our lifestyles. Don't destroy our beautiful backcountry with your power needs. Make our cities sustainable and more self sufficient for the greater good.

Regards,

Denis Trafecanty

