Thank you for your comment, sheila bowers.

The comment tracking number that has been assigned to your comment is SolarS50608.

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Solar Energy Development PEIS Comment ID: SolarS50608

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Attachment: BLM cumulative solar comments.doc

Comment Submitted:

See Attachment.

Sheila Bowers

July 15, 2008

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

Ladies and Gentlemen:

I am writing to urge the Bureau of Land Management to refuse to permit utility-scale solar energy development in Arizona, California, Colorado, New Mexico, Nevada and Utah. I have studied the issues in very great depth and have concluded, like all true environmentalists, that the time has come for a SUSTAINABLE energy policy. The time for pillaging our national resources for profit, greed and waste is OVER.

The first step is with you - you are in a position to refer energy consumers back to their own resources (rooftops, micro-wind, conservation, etc.) and politely suggest that an ongoing policy of destroying millions more acres of our beautiful, intact ecosystems is hardly a long-term solution to gross over-consumption of energy. Our open spaces are NOT renewable and it is disingenuous to suggest that obliteration of wilderness and wildlife on an unprecedented scale is any kind of a "green" or "eco-friendly" approach. I refuse to greenwash this rapacious policy and I urge you to do the same.

Like everyone else I know, I was DEEPLY disturbed to hear that you caved to Big Energy pressure to continue accepting and processing applications during what you are calling a cumulative EIR process. Pardon me for pointing out the obvious, but you cannot possibly have a report that is cumulative when inputs change daily. I am also, of course, very concerned that only "solar" projects are being considered, when the region is under siege from Big Wind, Mining, Drilling, Grazing, Military Base Expansion, OHV use and other permanently destructive projects. Surely you cannot get a decent "snapshot" of the scale of harm if you fail to include ALL leases for all purposes!

Americans recognize that our energy needs are growing and that our future depends on finding sustainable ways to meet those needs, implement conservation measures, and especially to free ourselves from dependence on centralized energy suppliers, who have neither the best interests of our public lands nor our citizenry at heart. We have a genuine opportunity to build out a healthy, clean and independent renewable energy infrastructure, and are relying on you not to undercut our progress by allowing Big Energy, once again, to externalize its costs onto ratepayers, taxpayers and the environment, while privatizing its profits. It is like a flashback to the era of Robber Barons (complete with old fashioned remote combustion and lengthy transmission models), and I think we can all agree that era needs to end. If you can't do it for the public's good, then please do it for the planet's.

So, aside from affording individuals an opportunity to participate in renewable energy free markets, it's very important that we protect the natural value of our southwestern lands and the wildlife that lives there as we pursue renewable energy development on previously disturbed lands, like our own properties, brownfields and Superfund sites. We must leave intact ecosystems alone.

A single solar energy plant will cover roughly 10,000 acres and must be built on land with less than a 3% grade and completely bare of plants and animals. When land is graded, all living things are destroyed. Erosion, dust storms, flooding, non-native grasses and other common desert consequences to man's mis-handling of ecosystems will make certain that all surrounding areas and wildlife are also destroyed. Most of these power plants will deplete scarce desert groundwater at a rate of 35 million to 200 billion gallons per year, which will inevitably lead to aquifer collapse and subsidence, not to mention certain death to all those reliant on the aquifers for their lives. Most of the "mirrored arrays" will shoot scorching hot, blinding beams of light diagonally across huge distances and up 350+ feet into the air. It's like some sort of bad cartoon where the mad professor designs a series of massive killing fields modeled after a "bug zapper." The fact that these plants are being seriously considered at all - much less as our "green" source of energy would be laughable if it weren't so dangerous.

Since there is no need for remote power plants in the desert to begin with, we urge you to adopt the "no project" alternative, and follow the example set in San Diego, wherein urban dwellers take responsibility for their energy consumption. They save the planet, and themselves, at the same time - it's flawless.

You see, unlike the era of coal, oil, gas, and combustion, we no longer have any reason to transmit power long distances or generate it far from point of use. Sun and wind are everywhere, and are free to us all. After factoring in transmission losses, harm to the environment, dry cooling inefficiencies and inherent unreliability, local, point of use renewables are a better alternative for ratepayers, desert ecosystems AND for preventing global warming. Please, don't believe the Big Energy propagandists who try to discount this viable alternative. It is ready, it is real, and these monopolists are the only thing standing between us and widespread adoption of their use.

If policies like the BLM's denial of projects in the desert were to take effect, the scaling of rooftop PV and micro-wind would be incredibly quick and affordable (no transmission, remember), and for once ratepayers, not Big Energy, would get to profit. No wildlife would be slaughtered, no families forced from their homes, no majestic viewsheds gone forever. It's the possibility of getting something for nothing from you at the BLM that keeps Big Energy from working with ratepayers, so if they get a message that our ecosystems are not cheapo sacrifice areas to their private profits, things will start to change more quickly and for the better. You can make such a difference to the lives of all of us if you will just do what you know to be right and tell these mercenaries "not in America's back yard."

Our Southwest deserts are fragile ecosystems that provide vital habitat for wildlife, including species -- like the desert tortoise -- that are currently protected under the Endangered Species Act, as well as many which are critical to our survival in ways we do not

yet understand. It is supremely arrogant to presume to kill off intact ecosystems, and think we have a full grasp on all the impacts that will cause.

You simply CANNOT KNOW the primary, secondary and ancillary consequences of destruction on this scale, since projects of this size do not exist anywhere on earth, so to review these projects as though you fully grasp all the consequences, would be lunacy, if you don't mind me saying so. What, for example, has caused 75% of the honeybees in CA to suddenly die? Right. Nobody knows. But you can bet that they didn't all join a cult and drink poisoned kool-aid. No, we did something, somewhere, and have not connected the dots, and now there is an ecological catastrophe. Do you want the next 20 versions of that on your shoulders? These awful projects are HUGE, they are HIGHLY DESTRUCTIVE, their efficacy is highly dubious, and they are NOT WELL UNDERSTOOD. With respect, you have no right to take these kinds of risks with our gorgeous, perfect deserts when our planet is already in peril and there is a better alternative.

I strongly support the Bureau's current policy to protect certain public lands from solar development. I also encourage you to expand these "off limits" areas to include all intact ecosystems, because ecosystem functioning is complex, perfect, and is more important than any single species, or any Big Energy profit margins. Have we learned nothing from bleached coral reefs, deforested Amazon, and mangrove destruction? Haven't the floods and fires shown us how devastating our footprint is on habitats which functioned perfectly before we ruined them?

Southwest deserts are already under considerable pressure because of off-highway vehicle use, development, pollution, and water shortages. The Bureau should take into account how solar development projects, wind projects, mining, oil, gas, and, in particular, multiple projects of all these types combined, could completely destroy a vital part of our natural legacy. You cannot help but conclude that no gold rush is worth it - we just don't have enough pure spaces left to mess around any longer.

Specifically, I urge the Bureau to incorporate landscape-level and cumulative analysis into its application review process. Proposed development sites do not exist in isolation. In an effort to monitor the overall health of our sensitive desert ecosystems, the Bureau should consider all existing and foreseeable projects of all types (not just solar) and, to the extent it is even possible, all their related environmental problems when reviewing all applications. I am confident that you will agree that No Project is the only alternative which makes sense, and will join us in supporting SUSTAINABLE energy on previously disturbed lands only. If any of the Superfund sites or Brownfields are under your jurisdiction, and a project has particular political clout, it may be an acceptable compromise to site it on such a previously destroyed piece of land, as long as it is very close to existing transmission lines already. Surely, it is an alternative which MUST be considered in every single case.

With careful planning, our energy future -- and the future of our wildlife -- will both be more secure. Everyone is counting on you. Thank you for considering my views on this incredibly important topic.

Sheila Bowers, Ratepayer, Taxpayer, and Admirer of Nature