

Thank you for your comment, Tannika Engelhard.

The comment tracking number that has been assigned to your comment is SolarS50677.

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Solar Energy Development PEIS
Comment ID: SolarS50677

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Attachment: BLM sola NOI_comments_7-15-08.doc

Comment Submitted:

[See Attachment.](#)

This document transmits my comments regarding the BLM's NOI to prepare a Programmatic Environmental Impact Statement (dated May 29, 2008) to evaluate solar energy development in Arizona, California, Colorado, New Mexico, Nevada, and Utah.

I am opposed to the proposed use of large expanses of undisturbed desert habitat within these states for solar energy development. While I recognize the benefits of and support renewable energy development, it is environmentally insensitive to develop this "green" energy source at the expense of the hundreds of thousands of acres of public land which provide habitat for rare and sensitive desert animals and plants. Along with the direct destruction and degradation of habitat, a patchy distribution of large solar farms will fragment the remaining, undeveloped habitat, potentially disrupting species reproduction and dispersal processes and decreasing the recovery potential for these species.

I am also opposed to allowing private, foreign corporations to generate huge profits by selling energy to local residents that was produced on public lands leased, and subsequently degraded or destroyed, from the BLM for pennies on the dollar.

My additional comments are as follows:

- A full range of alternatives for environmentally-sensitive production of solar energy should be discussed. Providing a full range of alternatives would assist the public in understanding the possibilities as well as the constraints associated with environmentally-sensitive solar energy production. Alternatives that should be discussed include but are not limited to the following:
 - The use of policies and incentives for businesses and homeowners in urbanized areas to retrofit existing and new buildings/structures to support solar generated power. As an example that such programs are realistic, Southern California Edison recently developed an initiative to lease urban facilities on which to install solar equipment. Also, the Sierra Club's report "[San Diego Smart Energy 2020: The 21st Century Alternative](#)", a comprehensive, peer-reviewed plan to provide clean, reliable, affordable energy for San Diego, provides information on existing policies and incentives available to San Diego businesses and homeowners that could be included in the discussion of such an alternative.
 - The identification of previously disturbed public lands in proximity to existing infrastructure and roads and/or close to urban centers that can be used for solar generation and transmission. The use of previously disturbed lands and existing infrastructure close to urban centers would reduce the extent of environmental damage associated with generation and transmission of energy many miles from its ultimate destination.
- A cost:benefit economic analysis should be conducted for each alternative presented in the EIS. Providing a cost:benefit economic analysis of a full range of alternatives would assist the public in understanding the possibilities as well as the constraints associated with environmentally-sensitive, cost-effective solar energy production.
- For each alternative, a detailed analysis of potential effects to sensitive species, including State and Federally-listed species, and their habitats should be provided. Sensitive species and habitats may be negatively affected by activities including operation and maintenance of solar generation and transmission facilities; groundwater pumping, water diversion/flood control facilities; access roads; supply and equipment staging areas; and use/transport of hazardous materials.
- Environmentally sensitive areas important for conservation of sensitive species and recovery of federally-listed species, such as designated critical habitat, recovery units or management areas

identified in federal recovery plans, and areas that provide core habitat and linkages between populations of sensitive plants and animals, should be excluded from consideration for solar energy development.

Thank you for the opportunity to comment.

Tannika Engelhard
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