

Thank you for your comment, Elaine Suriano.

The comment tracking number that has been assigned to your comment is SolarS50698.

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Solar Energy Development PEIS
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Attachment: US_EPA_Solar_scoping71708.pdf

Comment Submitted:

[See Attachment.](#)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 17 2008

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Solar Energy Development - Scoping
Argonne National Laboratory
9700 S. Cass Avenue—EVS/900
Argonne, IL 60439

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) has reviewed the May 29, 2008, Notice of Intent (NOI) to prepare a Programmatic Environmental Impact Statement (EIS) to evaluate solar energy development in six western states, including Arizona, California, Colorado, New Mexico, Nevada, and Utah. Our review was conducted pursuant to Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality's NEPA implementing regulations (40 CFR Parts 1500-1508).

The Department of Energy (DOE) and the Bureau of Land Management (BLM) propose to prepare an EIS to develop and implement agency-specific programs that would facilitate environmentally responsible, utility-scale solar energy development. The DOE proposes to develop environmental policies and mitigation strategies that would apply to the deployment of DOE-supported solar energy projects on BLM-administered lands or other Federal, State, tribal, or private lands. The BLM proposes to establish its own environmental policies and mitigation strategies to use when making decisions on whether to issue rights-of-way (ROW) for utility-scale solar energy development projects on public lands administered by the BLM. In addition, the BLM is considering whether to establish a Bureau-wide solar energy development program to supplement or replace existing solar development policy and the amendment of individual BLM land use plans to allow for the development of solar resources. The programmatic EIS will also consider whether BLM should designate additional electricity transmission corridors to facilitate utility-scale solar energy development.

EPA supports increasing the development of renewable energy resources, as directed by the Energy Policy Act of 2005. Using renewable energy resources such as solar power is necessary to meet national energy requirements while reducing greenhouse gas emissions. We believe that the programmatic EIS is the appropriate venue to identify landscape-level mitigation measures or approaches that are designed to minimize adverse impacts to sensitive resources in the surrounding landscape. The EIS should assist agencies in establishing the criteria that will be used to determine where solar development will be an allowable use and where it might be excluded. With that in mind, we have identified several issues for your consideration.

Although there are presently two solar energy technologies potentially suitable for utility-scale applications (i.e., concentrating solar power technology and photovoltaic technology), other technologies are under development. Accordingly, we recommend that the EIS discuss and compare existing and potential technologies.

According to BLM's website, a megawatt (MW) will require approximately 5 acres of to produce. As such, it is conceivable that, given the 2015 goal of 10,000 MW output from federal lands established in the 2005 Energy Policy Act, as much as 50,000 acres of land will be needed. Considering the significant environmental and natural resources that exist on federal lands in the six states in question, careful consideration must be given to establishing appropriate site selection criteria.

Moreover, the EIS should evaluate the environmental effects that would likely occur during all of the life-cycle phases of the individual projects – i.e., construction, maintenance and decommissioning. In a related matter, solar plants require the use of some water for maintenance and in other cases for cooling to increase efficiency. Access to water in a desert environment should be discussed as well as impacts to ground water and other resources depending on local water sources. Based on the potential scale of land that will be used for solar plants there should be a discussion about bonding for reclamation when the plants are retired from use.

Depending on the technology used, there may be a need to estimate impacts from noise or to the viewshed of adjacent lands used for recreation, or that contain archeological sites or on sensitive ecosystems. If there are worker safety issues outside the normal range of risks that should be addressed. There should be a discussion of air emissions, especially the reduction in CO, CO₂, NO_x and VOC that would be expected under specific solar power generation modes. The socioeconomic impacts may be significant and they should be discussed as well.

We appreciate the opportunity to provide comments on the preparation of the Programmatic EIS and look forward to continued participation in this process. When the draft programmatic EIS is released for public review, please send one hard copy and one compact disk to the two EPA Regional Offices listed the below at the same time it is officially filed with EPA's Washington D.C. Office. If you have any questions, please contact me at (202) 564-5109 or Elaine Suriano of my staff at (202) 564-7162.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. Hargrove', with a long horizontal flourish extending to the right.

Robert Hargrove
Director,
NEPA Compliance Division

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