

# **Solar Programmatic Environmental Impact Statement (PEIS)**

## **Hearing in Riverside, CA**

**June 15, 2008**

### **Alliance for Responsible Energy Policy presentation**

On June 15, 2008 the Alliance for Responsible Energy Policy attended the Solar Energy Development Programmatic Environmental Impact Statement (Solar PEIS) hearing in Riverside California. The federal agencies holding the hearing were The Department of Energy and The Department of Interior – BLM. The purpose of the PEIS is to examine the potential environmental impacts Big Solar (utility scale solar) will have on public lands in 6 states.

AREP is adamantly opposed to any public lands being used for private investor owned large-scale solar projects. This land belongs to us and should not be allowed to be scraped, bulldozed, and permanently destroyed. AREP supports placing renewable energy generation systems on the millions of bare rooftops across this country for truly clean renewable energy. No critical habitat should be compromised without first achieving this. Localized generation will also eliminate the need for new dangerous transmission lines, like Green Path North and Sunrise Power Link.

The following is the presentation the Alliance made to the participating agencies at the Solar PEIS hearing.

I'd like to start by expressing on behalf of the Alliance for Responsible Energy Policy, our most sincere gratitude to all the participating agencies for initiating this much needed Solar Energy Development Programmatic EIS. AREP believes the utility scale solar exploitation of our public lands in the 6 western states identified in this PEIS is the most critical issue facing the future sustainability of these very precious land resources. A comprehensive and transparent study process is imperative and most appreciated.

One of the most pressing concerns the Alliance has regarding utility scale Solar projects, as with all other renewable energy and transmission projects, is what appears to be a lack of regard for the sanctity of designated Wilderness areas and Areas of Critical Environmental Concern (ACEC's) by some of the project applicants. A representative for Solar Millennium, for example, has expressed frustration over the premise that these land designations might preclude them and others from financially feasible utility scale development. The Los Angeles Department of Water and Power has applied for Right of Way to build a 500KV transmission line right through the middle of an ACEC on the western edge of Joshua Tree National Park, of all places. Incidentally, LADWP has deceptively named that project **Green** Path North.

There also seems to be confusion among some of the members of the Environmental Working Group participating in the California Renewable Energy Transmission Initiative process regarding the BLM's development eligibility recommendations for these land designations. AREP **strongly** urges that designated and proposed Wilderness Areas and Areas of Critical Environmental Concern receive uncompromised complete protection from development, and first and foremost be excluded from any eligibility for solar, wind, AND transmission line development. We **must** draw a line in the sands of these critical land designations, and the BLM should make these recommendations on behalf of the people – the true owners of these lands. I realize this Solar PEIS has excluded these designations from the study, but I feel you should be aware of the debate occurring outside this study.

I would also like to enlighten the participating partners of this PEIS on what we perceive to be very solemn and somber feelings among an extremely large segment of members of national environmental organizations, regarding the sacrifice of pristine publicly owned lands for solar exploitation. AREP learned this first hand when addressing the Sierra Club California/Nevada Desert Committee just last month.

Our presentation was very critical of the Sierra Club and NRDC staff's apparent willingness to accept that scraping and permanently destroying potentially over a million acres of undeveloped pristine public lands may be necessary. AREP believes no environment should be compromised or sacrificed under a questionable banner proclaiming to save it. Our message was very well received by the club members and activists who overwhelmingly agreed. We believe our concept of comprehensive preservation more accurately reflects the feelings of the membership of the various environmental groups, and that their staff members may be working independently of that consensus. Please keep this in mind when considering the wishes of the environmental groups. I hope you will hear from many of the members during this hearing process.

Another significant concern the Alliance has is the high water use necessary to operate these enormous solar projects. Recently the governor of California issued an executive order to address the serious drought conditions plaguing the state – especially southern California. It is very widely accepted that southern California's basins are in depleted condition. In a recent California Renewable Energy Transmission Initiative meeting among the Environmental Working Group, discussions on the critical condition of water availability were steered towards very responsible oversight of how big solar applicants would obtain these enormous quantities of water needed to operate and whether or not they could accept a "air" or "dry" cooling process to reduce water consumption. It was no surprise that a representative of Ivanpah's project applicant Bright Source expressed concerns about this oversight and accountability of water use, and instead recommended using general "build-out" data that was compiled before the water crisis and is most likely outdated. This only supports AREP's belief that many of these project applicants are predisposed to only protecting the enormous potential profits they will enjoy if allowed to develop in our multi-use public lands, and less concerned about the permanent negative environmental impacts that will undoubtedly result if these projects are approved.

What we are deciding here, is whether or not failed 1970's Big Solar and 19<sup>th</sup> century transmission technologies can be repackaged and this time somehow be made palatable. Furthermore, many of these proposed solar projects will require the supplemental use of fossil fuel to keep up with production expectations. Will the utilities buying this power also receive

renewable portfolio standards credit for **these** electrons? Are we going to rely on the honesty of these corporations for complete and accurate electron accounting?

The Alliance for Responsible Energy Policy urges the participating agencies in the Solar PEIS to consider our argument that large scale investor owned solar projects are unnecessary when addressing air quality and carbon emission concerns, and in fact may actually contribute to increases in air pollution all things considered. Germany and Spain are generating over 2,000 new Mega watts of truly clean distributed energy through technologies such as localized rooftop photo voltaics. These countries have embraced policies that promote localized generation, but because of extensive lobbying by many of the Big Solar applicants and the energy retailers here in the United States, decentralized generation has not received the incentives from our lawmakers so we can achieve what is already being achieved elsewhere. We are moving in that direction, however - a direction that I hope will someday make this whole debate about sacrificing our public lands obsolete.

Thank you for allowing me to address you here this evening.

Jim Harvey

Alliance *for* Responsible Energy Policy

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