

# Solar PEIS Scoping Webinar Transcript

**February 13, 2023 12:30-3:30 Mountain Time**

**Lee Walston, Argonne National Laboratory:** Perfect. All right. Well, good afternoon, everybody. Welcome to this public scoping meeting for the Bureau of Land Management Western Solar Programmatic Environmental Impact Statement Project. To start, I'd like to let you know that close captioning is available for this presentation through the live transcript function on Zoom. To enable this just go down to the bottom of your screen and select the show subtitle or view full transcript option, and you'll have that available for you if that's what you would like.

This is the second virtual meeting that will be held for this project. There were 12 in person meetings that took place over the past month in Washington, DC. and across the Western U.S. The final scoping meeting which will be a virtual meeting, will be held tomorrow, February fourteenth. My name is Lee Walston, with Argonne National Laboratory, which is supporting the BLM in this effort. The overall agenda for today will consist of some opening remarks by Kathryn Kovacs. Kathryn is the Deputy Assistant Secretary for Land and Minerals with the Department of the Interior. Kathryn's remarks will be followed by a presentation by BLM staff, Jeremy Bluma and Shelley Sullo. After the presentation, we will have a comment session, during which the BLM will accept oral comments from members of the public that are attending this webinar.

This webinar is being recorded, and the recording will be made available later for the public on the on the project website. So if you have a comment, please be aware that your entire comment will be part of the public record for this project. During this virtual meeting the BLM is accepting oral comments. Written comments can still be submitted online or by mail. During this virtual meeting the chat function will be disabled. If you do have any questions, though - technical issues, for example - you can look at the chat, and there's an email address about technical issues. So that's a little bit about this meeting. I will come back a little bit later, after the BLM presentations. There will be about 40 min of presentations on the project by the Bureau of Land Management Staff, and then I will come back a little bit later to oversee the comment period, which I will explain after the presentations. So, without any further ado, I would like to introduce to you Kathryn Kovacs, of the Department of the Interior.

**Kathryn Kovacs, BLM:** I'm here, Lee, did you want to turn on my camera, or should I? And while Lee is managing that, I'll say welcome to everyone. Thank you so much for taking the time to join BLM today, at this scoping meeting. As we said, I'm Katie Kovacs. I have the honor of serving as Deputy Assistant Secretary for Land and Minerals Management at the Department of the Interior. The BLM takes seriously its role in managing the nation's public lands for current and future generations. The power and potential of the clean energy future is a critical part of that work. The BLM is poised to make a real difference in the advancement of renewable energy on public lands. Now, as you all know, the BLM is initiating a programmatic environmental impact statement for solar energy development in Western States. This effort will update and build upon that the 2012 Western solar plan.

The solar PEIS will support our country's renewable energy goals, energy, security, climate resilience and improved conservation outcomes. Be assured BLM is mindful of balancing the need for clean energy with its responsibility to manage the important natural, cultural, and historic resources on our public lands. These scoping meetings are just the first step in creating a two-way conversation that will very

much impact how the BLM does that. How it plans for renewable energy future, while balancing protection of the resources on our nation's public lands. As we go through this process we will work collaboratively with states, tribes, local governments, and the public. We are eager to receive constructive feedback from all interested parties, to assist in the development of the programmatic EIS. Again, thank you sincerely for taking the time to join beyond today for this important conversation. BLM is so fortunate to have an expert staff that is dedicated to the mission. They cannot do this without you. I'm so excited to see the work we all can do together. And with that I will turn it over to Jeremy Bluma and Shelly Sullo. Thank you.

**Lee Walston, Argonne:** Thank you, Katherine. We did not have the capability of turning on your camera, Katie, so I apologize for that. But for future speakers, I believe the functionality to turn your cameras on and off will be at the tops of your screens, or maybe bottoms of your screens.

**Jeremy Bluma, BLM:** Thank you, Lee, and thank you, Katie, just making sure everybody can hear me. Okay, this is Jeremy Bluma. Great. Thank you so much. And good afternoon, and thank you, Katherine, and thank you to everyone for your interest in the Bureau of Management's Programmatic Environmental Impact Statement for Utility scale solar energy planning. Thanks for being with us here today.

**Lee Walston, Argonne:** Jeremy, sorry to interrupt. Did you intend to have your camera on? I can hear you just fine. But the video is not coming.

**Jeremy Bluma, BLM:** Okay. No? Well, let's just go ahead with it as is, and if you could advance the slide, that'd be great.

Appreciate that. So as Katie had stated in her opening remarks, this is a very important project to the bureau and to the department. As the interest in renewal, energy development continues to intensify, we believe it's increasingly important for renewable energy development to be well planned and to balance the development with the BLM's responsibilities to manage for other multiple uses and protections for ecological resources cultural and historic resources, and just to name a few the purpose. There's several purposes of this presentation I'll kind of just go through a list here, you know. We certainly want to explain why the BLM. Is preparing a programmatic environmental impact statement or what we'll refer to as a programmatic EIS, we'll provide some context by discussing the BLMs 2012 Solar programmatic EIS and that was often referred to as the Western Solar plan we'll describe briefly the EIS Process we'll briefly describe some of the key elements of the BLMs planning effort and we'll touch on important things to us, such as cooperating agencies, compliance with the national Historic preservation act tribal consultation, and environmental justice, and we'll want to explain how you, as a public, are able to submit your inputs, ideas and concerns or issues that we can consider during and throughout this programmatic EIS. So we also want to note that we understand that these slides probably have a lot of information that will present today. And we know that folks want to know whether or not that information is available, and we most certainly will be posting this slide deck as well as we have posted all this. The slide decks for each of the in-person meetings that we've held, as well as the previous virtual meeting. We'll post that on the project website, and also where appropriate. We've included links in the presentation for additional information that will reference and talk about today. And so that will all be

available. And, as Lee mentioned, you know, we'll be recording this this virtual scoping meeting here today, and we'll also post this meeting as well as the closed caption transcript of it.

So with that we'll go to the next slide and we'll talk a little bit about why the BLM is preparing this programmatic EIS for solar energy. As many know, the BLM's multiple use mission as set forth in the Federal Land Policy Management Act, commonly referred to as FLPMA requires that the Bureau manage public land resources for a variety of uses such as recreation, livestock grazing, energy development, timber harvesting, and other uses, while also protecting a wide array of natural, ecological, cultural, and historic resources. This legislation also established a land use planning process that the Bureau uses to make decisions on where and how and whether or not public lands are used in certain ways. Also, in Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, the President ordered the Secretary of the Interior to review citing and permitting processes on public lands with a goal of increasing renewable energy production on those lands, while ensuring robust protection for our lands, waters, and the biodiversity, as well as creating good paying jobs. Furthermore, the Energy Act of 2020 directed the Secretary of the Interior to seek to issue permits in total that authorize production of not less than 25 gigawatts of electricity from wind solar and geothermal energy projects by not later than 2025 through the management of public lands and the administration of Federal laws. The BLM is preparing the programmatic EIS in response to the Executive Order and the Energy Act, and because its initial solar energy planning was conducted over 10 years ago. BLM is committed to planning for responsible Solar Energy Development on public land in a way that's responsible that balances the need for clean energy, with protection of natural, cultural, and historic resources.

BLM's initial solar energy planning was completed back in 2012 and since that time few things have happened. Certainly solar energy technology has evolved and advanced further than it was at the time to BLM has more experience evaluating potential solar developments on public land. More is known about how to best avoid or minimize resource impacts from solar projects and the solar development. Proposals have certainly expanded beyond the Southwestern States that were originally part of the plan in 2012. And so we'll talk a little bit more about that today. Again, we couldn't overstate the importance of your engagement here today, and we really want to thank you for being here. A lot has changed in the last decade, and we need your engagement in getting to the future of public land management. We want to make sure we get it right as an agency. We have no preordained conclusions here. And your input really matters. So let's start, we're going to give a quick overview of where we've been. And the questions that we need to ask and answer, to guide where we're going

Next slide.

So here, in brief, we'll explain a little bit about the Western solar plan that was completed in 2012. As we noted the BLM established its utility scale solar Energy program through the 2,012 programmatic environmental impact statement and record of decision that was commonly referred to the Western Solar Plan. This implemented a comprehensive solar energy program to administer the development of utility scale solar projects on public lands, managed by the BLM in those 6 Southwestern States. Those States included Arizona, California call Colorado, Nevada, New Mexico and Utah, the Western solar plan incorporated 3 land use allocations by amending land use plans in those States. Those 3 allocations that were defined in those record a decision were (1) priority areas, areas that would be identified and prioritized for utility scale solar energy development. Those were often referred to as solar energy zones. (2) There were exclusion areas identified under the record of decision in 2012. And those areas

were excluded from utility scale solar energy development based on 32 exclusion criteria and then we also identified (3) variance areas in that record of decision. Variance areas were areas that were identified as available for application to utility scale, solar energy. But they would have to go through a variance process because they weren't priority area. The Western Solar Plan also set out several design features sometimes known as best management practices which are intended to promote environmental, responsible solar energy resource development.

This table summarizes the land, use allocations by states, and I won't read every one of these metrics here. But just know that this information is available in the presentation here, and this is sort of a summation of those allocations of areas that were prioritized and available. Areas that were excluded from solar energy development. And then the variance areas which would be open to applications under a variance process. With that I will turn this over to Shelly Sullo, who's going to walk us through a few more slides.

**Shelly Sullo, BLM:** Hi, guys, can you hear me? I want to make sure. Okay. Hi, I'm Shelley Sullo. I'm the planning environmental analyst for the National RECO. This slide shows location of areas identified in the Western solar plan. There isn't gold or BLM, administered lands not available for solar development. Exclusion areas are noted in pink or salmon color, and the variance error is noted in blue.

Next slide, please.

Since the issue of the Western Solar plan, the BLM has permitted 41 projects with the capacity to produce over 9,000 megawatts on 75,000 acres in the 6 Southwestern States.

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The national environmental policy Act in 1969, also known as NEPA, establishes procedures that require Federal agencies to engage in environmental process that integrates to consideration of the environment and the Federal agency decision making. NEPA does not require the decision maker to select an environmental and environmentally preferable alternative or prohibited adverse environmental effects. But NEPA does require that decision makers be informed of the environmental consequences of their decisions. An EIS is prepared to analyze and disclose effects of a proposed action on the natural and human environment, and to consider the reasonable alternatives and mitigation measures.

This programmatic EIS considers a variety of modifications to the BLM Solar Energy program, including expanding to 5 additional States. This programmatic EIS will inform the decision maker on what modifications to undertake. Decisions will be documented at the end of the announcement process in a record of decision. If the BLM proposes to make these allocations, those allocations will be documented, and resource Management Plan amendments supported by the analysis of the programmatic EIS. The analysis process includes steps to ensure coordination and collaboration between agencies and provide the interest in public with opportunities to provide, input identify issues and offer solutions early in the NEPA process. The scoping period which we are in now is the first formal opportunity to gather input information and perspectives shared during scoping that will inform the analysis alternatives, the development of those, and mitigation measures considered in the EIS.

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We have explained generally the EIS process the programmatic EIS is a broad high-level NEPA review that assesses the environmental impacts proposed plans or programs for those subsequent actions that will be implemented either based on a programmatic EIS or a later environmental document. Here, that means that we will not be analyzing specific solar energy projects. But that analysis in this programmatic EIS will allow for greater efficiency in preparing NEPA compliance, documentation for individual projects by reducing repetitive analysis. Future NEPA analysis would be tiered off of this programmatic EIS.

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We want to emphasize that, although you might want to more detailed information at this time, we are not at that point in this process. This EIS process consists of 4 major stages scoping with a public notice of intent to prepare any EIS. The draft EIS and public comment period, the final EIS, and the record of decision, which is also called a ROD. We're currently very early in the process. We do not have alternatives developed. We are in the scoping period and receiving and considering public comments to help us formulate alternatives. It is important to note that you will be able to make comments on the draft PEIS that is planned for release this summer. So this is not your only opportunity. Since the issuance of the Western solar plan, the BLM has established renewable energy coordination offices, sometimes known as RECO's. Presently there's a National office which Jeremy and I belong to, 3 individual State RECOs located in Arizona, California, and Nevada, and one regional office that includes the States of Colorado, New Mexico, Utah, and Wyoming. These offices are responsible for the processing of renewable energy project applications for Solar wind and Geothermal energy resources on public lands, including an associated infrastructure such as electric transmission lines.

Next slide. There are 6 identified programmatic areas within the NOI that was published in the Federal Register on December the eighth, 2022 that we have requested your comment and this is the order they were presented in the NOI: we are considering this programmatic as to include changes to the study area, potentially including 5 additional States; changes to land use allocations and exclusion areas applied in the Western solar plan; and the variance process; adjusting the definition of utility scale used in the programmatic EIS; and in addition to these changes, we are exploring how we may further incentivize development in priority areas. I'll return this over to back over Jeremy

**Jeremy Bluma, BLM:** Thanks. Shellie. Okay, so this is the first area that we're really looking for some feedback on from the public – the study area. Here in the slide we can see that the study area of the 2012 Western solar plan was those 6 Southwestern States outlined in violet. So during this comment period, we're requesting comments on whether the BLM should expand its solar energy planning to include the 5 additional Northern States of Washington, Oregon, Idaho, Montana, and Wyoming. Inclusion of those States would mean that we, you know the agency, would consider establishing priority areas and exclusion areas. And you know, looking at solar planning within those States from a comprehensive standpoint.

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Number 2 has to do with those allocations. The first land use allocation that we want to discuss here is priority areas. In the 2012 Western solar plan BLM designated 17 areas as solar energy zones and those solar energy zones included approximately 285,000 acres throughout that 6 State study area. So as an initial matter, it's worth mentioning that we expect to now refer to those areas as priority areas in this planning effort. We're aware that other tiered analyses over time have used a variety of different terms,

which might be confusing. So we believe that establishing, you know, more broader programmatic term, just as priority areas will help clarify the applicability of the BLM programmatic analysis to those other tiered analyses as well. If the BLM decides to identify new priority areas or modify existing areas, the goal would be to do this, based on suitability for development and the potential of potential resource conflicts. And so we seek public comment on if we should identify suitable areas as priority areas and where those might be.

Next slide.

On the topic of priority areas, we understand that as a primary consideration of solar energy development, proximity to substations or transmission lines is necessary. This graphic represents one notional concept that the Bureau is considering for identifying priority areas. We could focus on identifying areas in some proximal distance from existing or planned substations or transmission lines. This graphic is not to scale, and it's purely conceptual. But in it you can see an approach where you could see in an existing transmission line in red and a planned transmission line in dashed blue, and the shading area around that and the bubbles around the substations, which are little boxes, would be an approach that we could look at identifying those areas as priority areas and then removing out the high resource areas for things like critical habitats for listed species, or removing areas that are part of a national historic landmark. Our areas that are protected and exist in resource management plans for wilderness characteristics, or, as shown in sort of this brownish squiggly line. You know, a national, historic, and scenic trail to removing those areas from any priority area so that they're maintained for management for the objectives of those areas. So we're interested in comments on whether this approach could be used to identify areas for more further detailed analyses. We're interested in public comment on the proximity if we were to use a concept like this, what proximate distance and miles or feet or to a transmission line or substation would be viable, and is that different? Is a distance different for substations than it is for transmission lines which would require more development of a generation tie line, or an additional substation or transmission? And then we're also interested in projections. We want to ensure that we identify priority areas where they're durable in a sense that we take into account some level of future technical or economic feasibility. So any sort of comments and feedback and ideas about how the agency should look to identify priority areas would be of great value.

Next slide, please.

The third area on which we're seeking public comment is whether to add or modify exclusion areas and our exclusionary criteria. This could be either generally applicable across the board, or it could be state, specific or resource specific. And so some background on the Western solar plan is that it set forth 32 exclusion criteria in appendix A. The first 2 criteria that it used to exclude lands for solar development were based on technology limitations at time related to slope of the land, as well as the solar radiance, the intensity of the sunlight oftentimes referred to as solar insolation. So those criteria were developed based on early limitations. As I mentioned, for the prior prevalent technology, which was concentrated solar rather than what is currently the prevalent technology which is photovoltaic systems. So we're interested in whether or not to BLM should continue using technology based criteria to exclude lands from solar development. In particular, the BLM is considering that is considered that such criteria are relatively static and inflexible, so they don't change as technology and feasibility changes over time. We are also interested in resource-based exclusion criteria. 30 of the 32 criteria in the 2012 Western solar plan were resource-based examples of exclusion criteria and include all designated and propose critical

habitat areas for species under the endangered Species Act would be excluded. Other areas that could be excluded by criteria would be those areas that are congressionally designated as national, historic, and scenic trails, other ones, such as national, historic, and natural landmarks. If an area is a wild and scenic and recreational river, old growth forests identified and land use plans would be excluded. And so we're interested on those types of criteria, of resources or other criteria that should be considered as exclusion areas. We're interested in public comment on new or modified exclusionary that could be considered by the agency and that includes criteria that might be applicable only to a certain state or even part of a State. And we also understand that there are significant interest in the development of wind energy projects on BLM administered lands, and although wind energy is not the focus of this planning effort, we're also interested in public input or comments and ideas about whether the BLM should also establish any sort of exclusion criteria for wind or wind energy development.

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The fourth area - we want to see comment on the variance process. The variance process is a set of procedures applied after a project application has been initially screened and prioritized under BLMs policy. And so when the BLM gets an application for solar energy, it does an initial screen of applications and then it prioritize those applications as either high medium or low, and those applications are prioritized. However, they're always given less priority than areas that are in leasing areas like the solar energy zones or any other designated lease area for wind or solar. But in the case of projects proposed in areas where there are variance lands after the initial screening of an application or prioritizing it, it would have to go through a variance process. And that's what we're interested in hearing from the public about related to the variance process. The variance process was set in the 2012 Western solar plan as a set of procedures to make sure that proposals were preliminarily screened right away. Applications assess the likely conflicts and of sensitive resources, and so forth, and applications would then be prioritized, you know, according to those efforts, and there's there was a requirement for applications and the variance report to be reviewed by the agency and then routed for concurrence by the BLM Director. The process is further described in the Western Solar plan in section 5.3 of Appendix B. And a link provided here if you want to go into and see the current status of that process. Also, the BLM did issue recently in December of last year, instruction memorandum that better explains and structures the variance process steps, and that I am that instruction memorandum is 2023 0 15 linked here in this presentation. And so to be interested on whether and how the variance process might be modified, or maintain the process as it currently is. And we're just interested in feedback from the public related to that that I that notion.

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Okay, topic number 5 is the definition of utility scale. BLM is interested in feedback related to whether this definition of utility scale should be adjusted through this solar programmatic EIS. The EIS will address projects that are within the definition of utility scale. So the Western Solar plan in 2012 defined utility scales a project that generates 20 megawatts or more, and so the designation of solar Energy Zones and exclusionary only applies to projects that meet the utility scale thresholds. And the variance process would only apply to projects that are over, that threshold of utility scale. So we're interested in public comment on whether the definition should be updated. Potential adjustments to utility scale could be setting a different megawatt threshold. It could be setting an acreage, disturbance, limit, or some other formulation entirely. We're interested to hear from the public about any thoughts about

adjusting the scale of proposals that fall underneath this solar programmatic EIS. And the sixth area listed in the NOI was an area is incentives to develop in priority areas. BLM has to maintain its discretion where it has legal ability and statutory authority to do so. But we are interested to hear if there are ways that the agency should consider incentivizing development in priority areas.

Next slide. I'll turn this back to Shellie.

**Shellie Sullo, BLM:** So what are we missing? We have touched on 6 areas that we identified in the welcome your thoughts on other issues that should be addressed to the programmatic EIS, next slide

Cooperating agencies. BLM will enter into agreements with tribal federal, state, and local agencies to establish cooperating agency partnerships. Committed to engaging and involving our agency partners, as cooperating agencies. Any interest, authority with jurisdiction by law or special expertise, will respect with respect to the environmental resources made by agreement, be a cooperating agency. Cooperating agency will contribute staff to participate in the EIS interdisciplinary team. They will participate in the EIS process and be formally involved in scoping. They will provide expertise, guidance, and review for the analysis. It will provide information related to the agency's rule. You will identify issues of concern regarding the project impacts on the natural and human environment. And it will provide timely input on unresolved issues.

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If we have any cooperating agency representatives in the audience to become a cooperating agency, you must respond in writing to the invitation letter. When you receive it from us in your response. Please describe how you have jurisdiction by law and or special expertise as well as potential, physical, natural, and socioeconomic issues of concern or of interest to your agency. An agreement through a memorandum of understanding must be completed prior to your participation as a cooperating agency. Please see the activities outlined in 40 CFR 1501 dash, 6 B. For further information on what your participation may include. If you're a potential cooperator, we hope you will consider participating in the scoping effort for the solar PEIS. All interested parties and agencies are invited to submit written comments. Before the end of the scoping period. Next slide

If we have any state historic preservation officer office representatives in the audience, we look forward to working with you. You want to note for clarity that in the context, direct section 106. Responsibilities, eligible properties include cultural resources as well as what you might traditionally think of as cultural properties. We also want to know that in addition to government to government relation and consultations, tribes are also invited to participate in the section 106 consultation. This process will run concurrently with a neat programmatic analysis.

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The BLM sent invitations to consult with tribes in early December we look forward to engaging with interested tribes. If there are any tribal representatives in attendance today, you can contact your State's deputy preservation officer or tribe liaison for your ability to be able to participate in this process.

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Regarding Environmental justice, executive order 12898 requires that the Federal agency pay attention to potential impacts of agency decisions on minority and low-income populations. It is the BLM policy that environmental justice must be considered in all proposed actions, including land use planning such as the programmatic EIS, the BLM will determine whether a proposed action or alternative will adversely and disproportionately impact minority populations, low-income populations and tribes, and consider cumulative effects including from recently foreseeable actions taken by other parties within the timeframe of the direct and indirect effects. Analysis will first continue to consider all potential social and economic effects, beneficial and adverse on the general population to determine its impacts on these 3 populations, are disproportionate the BLM will proactively provide opportunities for meaningful involvement of more of minority populations, low-income populations and tribes in the BLM decision-making process that will affect their lives, livelihoods and health, when the BLM develops, reviews and assesses, alternatives and potential mitigation measures is part of land use of the land use planning process. The BLM will consider environmental justice including as appropriate consideration of environmental justice issues facing those populations living near public lands, or working with or using public land resources. This commitment is, in addition to the BLMs responsibilities, to consult with Federally recognized tribes.

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**Jeremy Bluma, BLM:** Thanks, Shellie. For the proposed programmatic EIS and Potential Resource Management Plan amendment schedule, we kind of have a slide here that illustrates the, you know, BLM initial public scoping began December eighth, 2022, when notice of intent was published, and the public schooling period is planned to end 15 days after the last scoping meeting our last scoping meeting is a virtual one. It's planned for tomorrow. And so, unless there's any unforeseen technical difficulties, we would expect that the scoping period will close 15 days after tomorrow, which would put us through March first, so that is the schedule for scoping the bureau currently is planning to have the draft programmatic EIS developed and released by the end of summer 2023, which, as Shellie mentioned earlier, that's an opportunity for the public to again review and comment on the draft stage, and then we'll take those comments and input into account. And the final programmatic EIS scheduled to be completed by spring of 2024, with planned record of decision and notice of availability for the final programmatic EIS by summer 2024.

Next slide. So again, here's some areas that the BLM is seeking comments on, you know, effective comments that could address one or more of these are other areas. But these are some to get some ideas flowing. So we're interested to hear comments on areas that are suitable for utility scale, solar energy development. Simultaneously, we're also very interested to know and hear about areas or criteria that should be excluded from solar energy or wind energy, development and criteria that we own should use to determine those exclusion areas. Other useful information and comments would be really related to resources that would likely be affected by solar energy development potential resource issues that you feel that the BLM should analyze. We're interested to know if there's any data sources that the public thinks that the agency may not be aware of, but should use as part of this effort. And we're certainly interested in hearing about reasonable alternatives that could be considered within this analysis. And as we began with, you know your comments are genuinely so important through this process, and so it will help shape the alternatives and the analysis that's taken under this this whole effort. So we definitely employ you to provide us any sort of written feedback or verbal comments today.

Next slide.

A couple of online mapping tools that we want to make the public aware of as they kind of look and think about solar energy planning is one is the solar energy environmental mapper that was developed by Partner Argon national lab back in 2012. When we did the solar energy planning for the Western solar plan You know the soil. I'm sorry. The solar energy environmental mapper was created to support that Western solar plan, and some layers may not be completely up to date, but it's a great baseline data set that you can at least have some sort of a web base mapping tool to look at, and a little bit more of an updated one is down below the geospatial energy mapper or gem, as Argon National I've refers to it as that is a robust mapping data and analysis tool that has some really good interactive abilities, to look at decisions and kind of like modeling, and so that's another online mapping information system that's available to the public. And we think that that could be useful in the public's review or consideration of different ideas or areas. And to look at the different resource layers, and so forth, so you can browse and download and upload different. It just has a lot of technical ability. So we want to make you aware of that. And as we mentioned a few moments ago, the public comment period is expected to close at the end of March first 2023, and comments should be entered or postmarked by the first. So please contact us. If you have any questions about the process of submitting comments. The information on this slide is takes you to the project website. It also has the email address for the project, which is basically [solar@blm.gov](mailto:solar@blm.gov). If you per, if you prefer to put written comment in there, you can get the project address here or from the project website.

And if we go to the next slide

This is the project website. And as you provide any sort of written comment just before you do like, I want to make sure that everybody understands that before including you know your name your address, your phone number email address, all this other person identifiable information. If it's part of your comment, you should be aware that if you're in your comment may need to be like it's part of the administrative and public record for this effort. And so that information, while even though you may ask BLM to withhold your personal, identify information, we can't guarantee that we'd be able to do so. So with that in mind we do want your comment. We just want to make sure that you're aware that as part of a public process, that information is needs to be made available. So, and if you were to click here on the participate now, you could just that's an easy way for most folks to do. But if you're certainly welcome to just email us as well at the [solar@blm.gov](mailto:solar@blm.gov). This concludes our presentation, we have the root set the remainder of the time here today for the public to provide verbal comments, and we will turn this back over to Lee for him to moderate sort of the and facilitate the public comment so from there I'll turn it back to you Lee. Thank you.

**Lee Walston, Argonne:** Great. Thank you, Jeremy. Okay, so we have a slide here on some general guidelines for public comments. During this webinar. Here we are only doing oral comments, as we previously mentioned, and the way we're going to do this is through the raised hand portion of the webinar that you're viewing. And you can find that option that the raise hand option at the bottom of your computer screen under reactions. So hopefully, everybody can see that. And I can see that there are several people that have already found that. And so what we're going to do is we're going to try to go in order. And I believe the way zoom organizes as folks raise their hands. It'll order in order of how quickly you have raised your hand. So in a moment I'm going to read off the first person's name that has their hand raised. When I do call your name, please speak your name and your organization, and you'll

have 3 min to speak in order to give ample time for everybody else that might want to speak today so you'll have 3 min. I'll let speakers know, and about the 2 min mark or 2 and a half minutes. What the time is, and then we will new people. After about 3 and a half minutes, and so again. This is just to make sure we can have adequate amount of time for everybody that wants to speak. Okay, when I do call off your name you should have the option to unmute yourself. But if, after a moment that does not happen, I believe we will be able to mute and unmute on our end. So I'll give you the option to unmute yourself when your name is called. And so we will end the meeting after the last speaker has completed their statements. But we'll also leave the Webinar open, probably until about 3:30 mountain time and you will still leave the webinar open, and we will be here. Just want to note again that we're not taking comments in writing through the chat. The chat has been effectively disabled, but there is an email address that we've posted there in the Chat. If you would like to, or if you have technical issues, you can contact that email address. You can also submit written comments through the website that is at the bottom of this screen, and you can also submit them to [solar@blm.gov](mailto:solar@blm.gov), or that or that project website. So with that, let's begin. The first speaker that raised their hand appears to be Kevin Emmerich. So, Kevin, do you want to kick things off by unmuting yourself?

**Kevin Emmerich, Basin & Range Watch:** Great, for sure.

**Jeremy Bluma, BLM:** Lee, could I ask one favor of you, or wanted to find members of Argon? Could you drop the project website in the chat for folks to be able to click on it.

**Lee Walston, Argonne:** That's a great idea. I'm sure Heidi or Laura would be able to drop that into the chat for us. There it is. Thank you, Laura And Kevin, can you? Can you hear us

**Kevin Emmerich, Basin & Range Watch:** Yeah. Can you hear me?

**Lee Walston, Argonne:** Yup, loud and clear. Thank you, Kevin.

**Kevin Emmerich, Basin & Range Watch:** Thank you. My name is Kevin Emmerich my organization is basin and range watch, and I think I can fit in about 4 comments here in this 3 min. Comment number one, you're going to be amending about 2 dozen resource management plans and 11 Western States, and I'd like to see this comment deadline extended to April 1st. Comment number 2. You did mention the Energy Act and climate change, but you should be talking a little bit about the inflation Reduction Act, which had a poison pill in it that requires that the prerequisite for every solar project approved on Federal Land that 2 million acres will be open to oil and gas, policing, and then I think it's 60 million offshore there's a 2 million is on shore, and the 60 million is all sure, and that's yourselves. Is that really going to be an effective way to curtail climate change? Comment, number 3, we have this 5% slope that you might want to eliminate. And I would ask if that is eliminated, how far up the alluvial fans will these solar applications go because, you know, that will be a visual nightmare, and it will be impossible to mitigate will also impact surface hydrology it will impact a lot of different things like wildlife, connectivity. In fact, one of the solar developers actually asked for part of the national monument to be removed. So they could build their project narrow infrastructure. Have a if they're going to need that 5% slow removed. Then that's going to be a big conflict there. And it's going to impact some really important cultural and natural resources. Comment number for the variance process does not work in about it, at least I don't think so. It seems to just be a prerequisite to approving a project, and it's almost like a pre scoping process. That gets everything out of the way, and that's how I see it being handled a

lot in Nevada. So things do need to be improved. But first off extend that comment period. Thanks, and have a good day.

**Lee Walston, Argonne:** Great. Thank you, Kevin, and thank you for also muting yourself after you were done. It's one thing I wanted to remind folks when you're done with your comment. Please remember to mute yourself again. Next we have Julie Smith.

**Julie Smith, EPA:** Good afternoon. My name is Julie Smith, and I am with the NEPA office at the EPA Region 8 office. I have first a process question related to the cooperating agency status, and as that relates to also the comment period that is currently on March first, and it was previously stated in an MOU must be completed in order for cooperating for an agency to act as a cooperator in the development of this programmatic EIS per CEQ regulations. That isn't a requirement, and while it may be something that BLM does on the regular or follows BLM internal policy, the time that it takes to negotiate, refine, agree to, and execute an MOU is not realistic from this point to the end of the scoping period on March first. So I wanted to point that process conundrum out in terms of those folks who have not yet signed up to be cooperating agencies or have a legitimate role as a cooperating agency. My second, really, it's a comment and question. But my question is in the presentation. You all did not mention utility scale storage, and the role that utility scale storage plays when it comes to transmitting the electrons that these generating facilities would be producing as well as the world that these facilities the storage facilities play in balancing the grid. Once those things are in operation, and you have these generation sources actually interconnected into the existing grid. So we will be commenting in writing on that. But I just wanted to raise that right now for the group, and also just as an employee infrastructure component because there are environmental consequences also related to citing utility scale storage. Facilities. Thank you very much for your time.

**Lee Walston, Argonne:** Great. Thank you, Julie. Next week we have Paul Cooley

**Paul Cooley:** Thank you. My name is Paul Cooley. I was born in California, and I live in Los Angeles County, in Culver City. I'm a retired systems engineer who spent half a century supporting Regional defense and national security. I'm also a member of this year Sierra Club, the Audubon Society. Long time desert hiker and climber, and dedicated birder. My father was a surveyor for one of the power lines still in use between Hoover than Boulder Dam and Los Angeles. Our southwest deserts are not wastelands, but beautiful areas and habitat for many birds and other wildlife. They reflect our history. And the cultures of native Americans. Addressing reasonable alternatives in particular. When I climbed to the hilltop near our home in Culver City, I marveled at all of the residential and commercial rooftops below me. A few have solar panels, but most do not. Los Angeles Air Force Base has solar panels on structures in the parking lot, as does our local public library guys, are permanent has solar panels atop their parking structures. Please. Let's do more of that before we use valuable desert habitat and risk destruction of desert wildlife for commercial solar farms and more power lines to get the energy from them to our cities. Let's first generate solar power where it will be used. I do realize that there is much potential for solar power from our deserts, and if we must use desert land, the DRECP. Is the best model for its use. Thank you very much for this opportunity to speak in defense of the deserts.

**Lee Walston, Argonne:** Great. Thank you, Paul. Next we have Lionel mares. Sorry if I mispronounced your last name.

**Lionel Mares:** Yes, good afternoon. My name is Lionel, I am a resident of Sun Valley, California, Los Angeles County. I'm a public advocate community advocate and board member and I'm also a member of the Sierra Club, and I'm here to speak on this issue because I care about the environment. The wildlife, the ecosystem, and I just want to say that the DRECP is working and should not be opened up to changes as part of this process. Making changes, will undermine the current balance between energy production and conservation. There's no need to fix something that is not broken, because, you know, I'm a hiker, and I also like to buy school, and I also like to explore different places. You know, and I am concerned about, you know the native impacts on the wildlife. Sensitive habitats, and I do understand the importance of green energy and solar to transition from fossil fuels by also, like the BLM. And you know it's better going to take into account of a sensitive areas that might be impacted because of the you know, certain animals, desert animals and things like that. So I'm just concerned. But you know, and I am. Finally, I like to say that the protected lens of the Californian desert are important for creation. They provide place for members of the city community, and visitors to alike, like myself, to hide bicycle and engage in off-road motorized recreation, and finally, the BLM. The bureau land management shouldn't model the DRECP. And other areas, and thus prioritizing landscape level planning to identify lower conflict, lower risk areas for development as well as areas for protection and exclusion that support wildlife. And their habitat, climate, resilience, and connectivity should be the standard of. Are yield the balance of my time, and I hope you take those into account. Thank you so much.

**Lee Walston, Argonne:** Great. Thank you, Lionel. The next person we have is Joan Taylor.

**Joan Taylor:** Thank you. Joan Taylor here, Palm Springs. As someone who was very involved in the DRECP process. I urge you not to include the DRECP in this, in exercise amendment, the DRECP is already refined. The allocations made under the 2012 solar PEIS it is done much more in depth, landscape planning, including input from independent science advisors, comprehensive set of conservation management actions very inclusive stakeholder process from tribal industry, utilities, NGOs counties and so on it took 8 years to achieve a balanced plan. It has never been challenged. Projects in the DFAs are incentivized by generally getting environmental assessments, and they are moving forward. The plan was in limbo during the Trump administration, but several large projects have been approved since then. DRECP is a balanced plan, is just starting to get into gear, and is working as planned, whereas 285,000 acres of zones were zoned in the entire 2012 solar PEIS. DRECP is designated 388,000 acres. As development focus areas. So and now well, over 200,000 acres are still available for solar in these development focus areas, the current technology which is 6 acres per megawatt or less at 200,000 acres. This equates to more than 30,000 megawatts, and even if you discount for the conservation management action setbacks, there is still an immense amount of capacity to site solar in the DRECP development focus areas, do you see is working and is a model of landscape planning for solar. Bottom Line don't amend it. General comment regarding other States: general large-scale solar is completely incompatible with preservation of wild lands. In addition to being at the foundation of plant and animal life on which we depend, wildlands, including arid deserts are also the lungs of the planet. Deserts have vast amounts of captured carbon over millennia and stored it underground. Industrial solar disrupts this cycle and releases significant stored carbon in the atmosphere. BLM must analyze distributed and non-BLM alternatives when it analyzes the no-action alternative. I think you will find that there are many other better alternatives. Basically, given the irreplaceable resources on public land. It's crucial to locate industrial solar, and where it does no or negligible harm it's imperative to exclude. All roadless areas, intact landscapes, and important habitat linkages, whether those linkages are occupied or not, they will

be needed in the face of climate change. Regarding transmission current technology. It does not require solar to be tethered to wires it's like a cell phone. It can go anywhere. It's not necessary to have close proximity to transmission appropriately disturbed lands are not always proximate to transmission. It's most important to identify lands that have been disturbed, fragmented, or type converted and to conserve other public lands for all their resources. Thank you.

**Lee Walston, Argonne:** Great. Thank you, Joan. Next we have Susie Boyd, Susie.

**Susy Boyd, Mohave Desert Land Trust:** I want to thank you for the opportunity to share our concerns regarding changes to BLM's 2012 solar plan I'm Susie Boyd, public Policy coordinator with Mohave Desert Land Trust. We're a nonprofit desert conservation organization, headquartered in Joshua Tree, California. We've acquired and conserved over 110,000 acres while currently managing over 50,000 acres of pristine desert land. Our mission is to protect the Mojave Desert ecosystem, and it's scenic and cultural resource values. We recognize the need for changes to the 2012 solar plan based on changing circumstances in response to climate change threats, however, we urge the BLM to keep the DRECP intact and unchanged. The DRECP is exemplary and showing that landscape level planning can do more than protect our public lands on a large scale. The DRECPs framework has also demonstrated that planning across the desert landscape has expedited renewable energy planning, bringing us closer to meeting our energy transition goals. California's DRECP provides a successful model for landscape level. Smart from the start, planning that identifies lower-conflict areas for development and conservation priority areas that require protection and exclusion. These high value conservation areas include priorities such as wildlife, habitat connectivity and climate resilience. The BLM needs to exclude the DRECP from its study area for solar PEIS updates, the DRECP is working and providing balance between energy production and conservation. The plan provides certainty for lonely processes, for energy transitions, such as transmission planning in order to best meet our State's 100 goals in the Biden Administration's renewable energy goals while protecting our desert lands, treasured natural resources we urge the BLM to leave the DRECP as it stands 8 years in the making, unchanged and intact. And thank you so much for your time.

**Lee Walston, Argonne:** Great. Thank you, Susie. Next we have Moises

**Moises Cisneros:** Hi. My name is Moises Cisneros I'm a resident of the city and county of San Bernardino, California. Thank you. Deputy Assistant Secretary Kovac and the BLM staff for your hard work, serving the public interest, and for the opportunity to comment. The solar PEIS planning process should not open up the DRECP and California for changes. Instead, the BLM should use a DRECP as a model for how to plan renewable energy projects on public lands, making changes will undermine the current balance between energy production and conservation. It took 8 years for the to be to be crafted out of extensive discussions and delicately balanced compromises by agencies, developers, stakeholders and community. I liken the DRECP solar planning design in California as a Jenga tower. The tower currently stands tall and as solid as it can be. Reopening the DRECP could mean the removal of the last pillar that keeps the whole solar program in the California desert up and running smoothly to incentivize development of solar in the desert. Pour over the DRECP it will prove to be a model for how we build renewable energy projects in harmony with conservation priorities. Thank you so much for your time.

**Lee Walston, Argonne:** Great. Thank you. Moises. Next is David Eder

**David Eder:** Hello! My name is Dave Eder. I thank you so much for the opportunity to provide public comments I live in Pasadena, in Los Angeles, California. I'm semi-retired. I've worked in municipal government for 32 years, I'm a member of the Sierra Club, and I love camping through the Federal and State lands in California and in the Western States. In fact, in 2 weeks I'll be taking friends on a desert camping trip that will include stays in the Anza Barego Desert and along the Colorado River as well as a visit to the Sonny Bono Assault and sea national wildlife refuge. My comment focuses specifically on the California Desert Renewable Energy Conservation Plan, known as a DRECP, and its potential role in this larger programmatic EIS. As you're aware, the DRECP was a product of much time, involving extensive public and stakeholder input. It's a compromise that has consensus and support for the local communities and users. Importantly, it has facilitated California to move forward with more solar-generated electrical power. The DRECP has been working for nearly 7 years, and it has not been challenged by a lawsuit. These are no small accomplishments. We should not be tampering with the DRECP as part of this larger process. In fact, I think we should use a DRECP as a model for replication elsewhere in BLM's planning process. It's working in Southern California. This model will also work in the other regions of California and the other Western States being considered within the programmatic EIS. This is very important, as we seek to balance both the development of renewable energy products, project projects and the conservation of sensitive wildlife habitats. Thank you for allowing me to speak today, and I invite you to join me in checking out the migratory birds at the Sonny Bolo Sultan Sea national wildlife refuge. It is quite spectacular.

**Lee Walston, Argonne:** Thank you, David. Next we have Alan Carlton.

**Alan Carlton:** Good morning. My name is Alan Carlton. I live in Northern California, but I've been coming down to the desert since the Desert Protection Act was passed 20 or 30 years ago. And I value natural resources and a protection for wildlife and other things. On this basis I reiterate what other people have been saying, that the DRECP is a good plan. It's been working. It protects some area - the areas that must be protected and allowed for some solar. There are other areas for solar. Certainly we need to have solar. That's the wave of the future, as far as energy. My other comment is that, nationally, and in California there's 30 by 30 to protect 30% of the land by 2030, a lot of this land is in the desert, and we have to consider 30 by thirty's section of open and undeveloped land. It is equally significant and important as developing solar, and make sure that the solar is not infringe on the 30 by 30 goals.

**Lee Walston, Argonne:** Thank you very much.

**Lee Walston, Argonne:** Great. Thank you, Allen. Next we have Marianne Ruiz

**Mary Ann Ruiz:** Good afternoon. My name is Mary Ann Reese. I live in Chino, and I love spending time camping, hiking and stargazing in our desert. Want to thank BLM staff here for your hard work in managing our public lands, and for this opportunity to speak during this process. I agree with previous speakers that the DRECP should be left intact. It is working, and actually should be a model for clean energy planning on public lands nationwide. You know, undercutting it now will make meeting the administration's clean energy goals as well as that our goals to protect 30% of lands and waters by 2030 more difficult in California and other regions. You mentioned concerns for environmental justice. Here in Chino, where I live, and in the entire inland basin, we really need all the help we can get from natural working lands that sequester carbon. This region is heavily impacted by diesel pollution from the logistics industry that is largely sited in low income and minority communities. We are a region in crisis, as was detailed just this last couple of weeks in the report recently provided to Governor Newsom,

along with a request that was signed by more than 60 local organizations to declare a public health emergency in our 2 counties here - riverside and San Bernardino. Keeping carbon sequestered in undisturbed desert lands is part of the solution to our regional health crisis. We're currently being subjected to over 200 million truck trips per day, I mean sorry per year, which results in over 300,000 pounds of diesel particulate matter. Over 30 million pounds of nitrogen oxides and over 15 billion pounds of CO<sub>2</sub> per year. Just in our 2 counties, you know. There we also have a 1 billion square feet under Warehouse house roof. That's 23,000 acres that could be supporting solar, and very few of them do, keeping carbon sequestered in undisturbed desert lands is really part of the solution to these harmful emissions and protecting our air quality the science is clear intact desert soils. In California, deserts sequester and store a significant amount of carbon. Nearly 10% of the State's carbon. We can't reach our climate goals by disturbing lands important to sequestering carbon. Please keep the DRECP intact, and protect not only our public lands, put our lungs here in the end of the region. Thank you.

**Lee Walston, Argonne:** Thank you, Maryann. Next we have Matthew Kirby

**Matthew Kirby, National Parks Conservation Association:** Hello! Yes. My name is Matt Kirby. I'm the senior Director of Energy, and Landscape Conservation at the National Parks Conservation Association. Thank you all for the opportunity to present remarks today, on behalf of our 1.6 million members of supporters across the country that care deeply about the future of our parks. NPC has been engaged in planning for renewables on Federal lands since 2008 advocates across the country, but it's especially in the California desert. We're closely engaged in the creation of the DRECP as well as the original 2012 solar PEIS. We appreciate the ambitious climate emissions reduction goals set by this administration, as well as actions taken to reduce fossil fuel development on our federal lands. Climate change, we know, is the single most important threat to national parks across the country, and we believe that we can responsibly transition our country to our renewable energy while continuing to protect sensitive park landscapes. So there are just a few points I would like to touch on today that we will further elaborate in comments that we plan to submit in writing. First, we do support the expansion of the PEIS to include all 11 Western States in the last decade technology has drastically improved utility demand has increased significantly, and industry has increased accordingly, and those 11 Western States are home to more than 30 national parks and over 100 other National Park Service sites. All of these park landscapes have unique resource values and deserve to be part of the planning process as we move forward, developing renewable energy. Secondly, as many have stated before me, we ask that you not include the DRECP in the study area that exhaustive interagency landscape level plan initiative resulted in a plan that well, maybe not perfect, should be a starting point and a foundation that can be replicated and built upon across the West and it should not be touched. Third, please ensure robust public engagement in impacted communities. Specifically, we urge you to include extensive tribal consultation as part of the planning process. We appreciate the BLM's recognition of its responsibility to Indian Tribal nations pursuant to executive order 13175. However, the BLM must go above and beyond in it's outreach and engagement to Tribal nations, given the history of mistakes made during its previous solar planning process. And finally, we urge you to continue using the National Park Services criteria for assessing high conflict lands. This criteria was a foundational document for the 2012 PEIS and we hope to see the park services updated criteria utilized in this process, moving forward. So thank you again for the opportunity to provide comments today. And we look forward to working with you, moving forward.

**Lee Walston, Argonne:** Thank you, Matthew. Next we have Elvia Hernandez



**Elvia Hernandez:** Hi, there, everyone, and thank you for pronouncing my name correctly. Really appreciate that. I want to thank the host Lee, Jeremy, Laura, Shelly, Heidi, and I'm hoping that's everyone. I hope I didn't miss anyone. You know this has been a very good presentation, very organized. Thank you so much for showcasing good faith, interest, and public participation in this process. You know it's a very good forward-facing look for BLM, and it's greatly appreciated at least for me personally. I'm a resident of the high desert part of the Mojave Desert home to the Western Joshua tree and other beautiful species native to this area and region. I'm a member of the Sierra Club, and have been since I was 19 years old. Today I just want to highlight and get ahead of certain narratives that I think will be coming down the stream first. I want to reiterate the DRECP should be protected. It provides a very good methodology for approval of industrial solar energy, planning and construction, and you know, just kind of even opening it up may give the appearance of you know, a moment in time where solar industrial solar can come in. And you know, really take more advantage of the situation than we would like, and that's like community stakeholders, native American tribes, and everyone who is very concerned, of course, with our deserts. I would like to mention that places like juniper flats Canyon, Alligator Rock, Corn Springs, which have important California history, significance, and sacredness to native American tribes are protected by the DRECP and that's why I'm wanting like so many others who have commented for the DRECP to remain fully intact during this process. Of course, my second part of the comment is, I want to get ahead of a narrative. I believe solar industry will be pushing, maybe, throughout this process, hopefully I'm wrong, but I want to make sure that industrial solar is not viewed as the only solution for reaching our climate and energy goals - that it is only part of a solution to a larger necessary shift to renewable energy. Things like rooftop solar, agricultural solar, wind farms, and things like hydroelectric, a mixture of things geothermal and like, will be helping us achieve our renewable energy goals. I don't want it to feel like there's this immense pressure to go into industrial solar when there are a lot of different solutions to reach our energy goals. Thank you so much again for hearing this out, and I would like to take this moment in time to say Thank you for the presentation, and for putting in those links. It's very helpful.

**Lee Walston, Argonne:** Great. Thank you, Elvia. Next we have Mary Buxton, Mary

**Mary Buxton:** Good okay. First of all, I want to thank all of you for the for the efforts you put out for the public interest and for our renewable energy future, and also for the opportunity to have a comment. I'm Task Force leader for the Sierra Club Lumber Prieta Chapter 30, and I'm also in their executive committee, and personally, I just took 2 trips to the desert this year. So I'm a recent knowledge and recent desert enthusiast, and my son is also headed out on the Pct in March through the desert. So for any changes that could be under consideration to the desert renewable Energy conservation plan. I think there shouldn't be changes. I spent 42 years as a psychotherapist, and I think spending 8 years to create a plan that continues to work should be really protected and respected, and, you know, cause it involves all sorts of collaboration on federal, state, local government levels, community members, user groups. It just is, seems like it must have been a phenomenal process. So, instead of making any changes to it, I think it should be used as a model for the future. Whatever they did to create it, and the structure that it has now. So thank you very much for allowing me to comment and for holding this presentation today

**Lee Walston, Argonne:** Thank you, Mary. Let's see. Next we have John Hiatt, John

**John Hiatt:** Yeah. Yep. Thank you. Can you hear me? Okay, I'm John Hiatt. I live in Las Vegas, Nevada, and most of my comments are particular to Nevada. Since that's area I'm familiar with. The first thing I would say that really needs to happen is you need to go back and analyze why the 2012 solar PEIS has not really worked out here very well in Nevada. With the exception of the dry lakes, South Solar Energy zone, none of the others have seen any action. All the action has been on the variance lands and it's really important to understand what we've done in the past hasn't failed. It's also important to understand why in that is different than most of the other States. Some 85% of the land here is federally owned, and so Nevada is unique in terms of that very large percentage of Federal land. We also are very dry, and we need a lot more land to support wildlife than we see in other places. And how to construct wildlife corridors is very important. Under the role of desert soil, distinguished in this entire process is incredibly important in this entire process is incredibly important, and something that has not really been taken into account in the past. It's very important to understand what the object of the exercise is here in terms of solar energy, lowering carbon emissions. If it doesn't do that, it's really not serving any function. There's several other issues that I will be commenting on in written comments. But we need to deal with water here in Nevada. We've seen, or we are seeing applications for wells to be drilled, and significant water to go along with Solar Energy developments which doesn't make a whole lot of sense in an area which is horribly short. Of water, so that needs to be taken into account. One of the comments that I'm hearing, and I will really like to see addressed is the rules with regard to reclamation, decommissioning, and reclamation. We're not going to suddenly not need electrical energy in 30 years and we have no idea at this point in time if we can really rehab these lands and make them so called "Natural" again. So the idea that somehow they just write a plan for reclamation and post a bond and everything will be okay is kind of nonsensical, and that needs to be seriously looked at. Because this really is a permanent industrialization of the public lands, and these acres that are permanently transferred needs to be minimized to the greatest extent possible. Thank you.

**Lee Walston, Argonne:** Great. Thank you, John. Next we have Eric Hiss, Eric

**Eric Hiss:** Yep. Hey? Can you hear me? Okay. Hi! My name is Eric Hiss, and I'm a resident in Los Angeles. First I like to thank everybody. The chair and staff, the BLM for allowing us to voice our views. Briefly about myself, I'm a fifth generation Californian, and someone who is raised to appreciate all the natural beauty and resources of our great state since childhood. I've been able to experience so many wonderful locations. The beaches, mountains, and of course, are amazing deserts. As a travel journalist who writes about these incredible places for a global audience I would like to remind everyone that tourism is a 140 billion dollars year industry in California. People come from every State and from around the world to see places like our pristine deserts, not to see er radically placed solar farms. So that's real money put in the pockets of locals. So here's the deal. Yes, we need solar infrastructure. But, as mentioned often in this meeting, the DRECP is working and should not be opened up to changes as part of this process. It took years of careful planning to create it, and it effectively balances energy production and conservation. If it ain't broke, don't fix it. As a matter of fact, the DRECP can be modeled for how we build renewable energy projects not only in California but across the west. Thanks again for giving me the opportunity to express my views.

**Lee Walston, Argonne:** Great. Thank you, Eric. Next we have Daniel Jivanjee.

**Daniel Jivanjee:** For the staff and general public, I just wanted to wish you all a good afternoon. My name, of course, is Daniel, and I'm from the city of San Bernardino, in San Bernardino County, California.

Just a little bit about myself. I do digital marketing for living, and I like visiting all the national parks in the area and doing outdoor recreational activities. And today I wanted to leave a public comment regarding the possible creation of a national monument in the Chuckwalla area, and to caution against placing solar fields in undeveloped areas of the desert. Doing some cursory right there are many areas within the Coachella Valley and beyond that have ample parking structures, large lots, bigger box, retail warehouses, and even canals and waterways that make the perfect candidates to house solar panels. There's many economic benefits to having a new national monument. Large solar panels, far away, and one thing to notice large solar panels far away from settlements, tend to lose electricity over large distances, and cause ecological and descriptive harm to the vegetation and animals in the area. I would say a happy and economical and ecological compromise would be for solar companies to partner with the local governments, county governments and state governments and private businesses, to see what opportunities there are to place solar panels in the area where the demand is the highest. Here's some use cases for you all to think about. Could we have solar panels on big box retail stores, truck stops and rest stations, hospitals and malls? Could large retail landlords and property developers gain another income stream by partnering with solar companies (Ie. Prologists). And then the last one is the California aqueduct is largely uncovered. Could solar companies work with the State Government to place panels on large stretches of the canal, while you know, while doing that, you could reduce water evaporation, but also gain another venue of generating electricity. So in summation, I'll say, let's save the environment and grow the economy at the same time. I urge you to leave the current agreement for solar development in the California desert as it stands to the DRECP. Thank you, and I yield the rest of my time

**Lee Walston, Argonne:** Thank you, Daniel. Next we have Jenny Binstock.

**Jenny Binstock, Sierra Club:** Hi, thank you so much. My name is Jenny Binstock. I'm the California campaign manager for this year Sierra Clubs, national public lands campaign, and I want to thank you for today's meeting and the opportunity to comment on the update to this solar programmatic EIS. So the Sierra Club works tirelessly here in California and nationally to advance our shared clean energy goals, and we know that public lands provide critical opportunities for developing responsibly cited renewable energy. We also know that protection of our public lands, as many have said here in this meeting, plays an essential role in promoting climate resilience, and carbon sequestration. Both strategies are critical for addressing the climate crisis as such. The updated solar PEIS should not be designed to meet the entirety of our State's (California) Federal clean energy goals. Other public land should be examined for their renewable energy development potential. And here in California we have sufficient private land opportunities, particularly on degraded agricultural lands, to meet our goals here. So I also want to urge the BLM to use this process to emphasize a landscape level approach to planning, as others have also noted, that identifies lower conflict to lower risk areas for renewable energy development as well as priority areas for protection and exclusion areas for species habitat, climate, resilience, and connectivity. Doing so does provide a clear pathway for expediting renewable energy development on public lands while protecting their ear. Replaceable conservation value. I also want to encourage the BLM to include state agencies and other stakeholders in the planning process. In a meaningful manner. Early on, including local communities as early as possible, and ensuring that tribes are consulted and involved in the process, again, early-on to avoid impacting culturally significant resources and landscapes. I want to urge the BLM to undertake a very careful evaluation of important natural resource areas of avoid developing in remote areas in California. That means BLM lands outside of the DRECP, including

important natural resource areas like the Modoc plateau around the Carrizo National Monument within the Diablo range and along Western current county. Many of these areas include rare and intact landscapes found nowhere else, and lastly, like so many others that I appreciate on this call, and in this meeting I want to stress that the desert renewable energy conservation plan should be upheld in this process as a model for other parts of California and across the West, for how we balance renewable energy development conservation, recreation, protection of cultural resources, transmission planning, and more just as importantly, I want to urge you to exclude the BLM lands within the boundaries of the DRECP from the study area the DRECP is working with 2,400 megawatts of solar approved on BLM lands since 2016, and another 10,000 solar applications currently in process. The DRECP as we've been discussing today, has broad consensus providing critical regulatory certainty. That would be jeopardized if it's opened up for changes, and would likely encourage litigation. This could slow down our critical efforts to meet President Biden's renewable energy and public land schools, and California's efforts to meet its Sp. 100 goals. Thank you so much again, for hosting public meetings. Want to encourage as much public engagement as part of this process as possible. As other speakers have commented, this is a plan with tremendous implications, and deserves as many folks weighing in as possible. Thank you so much.

**Lee Walston, Argonne:** Great. Thank you, Jenny. Next we have Levi Rose.

**Levi Rose:** Thank you very much. Other speakers are much more sophisticated. I just want to <inaudible> unspoiled lands. We can't be dealing with emissions and damaging pristine land, and that's what this program will do. Let's maximize every rooftop, every parking lot, every warehouse top before we touch an acre of wild lands. Thank you very much. I'm with public power in San Diego. Thank you very much.

**Lee Walston, Argonne:** Thank you. Greg. Next is Marcus Pearson. Marcus? Are you available

**Marcus Pearson, TWS:** I am. Thank you. Can everyone hear me?

**Lee Walston, Argonne:** Yes, we can thank you.

**Marcus Pearson, TWS:** Great Hi! Everyone as I just said, my name is Marcus Pearson, and I'm a legal and policy consultant, representing the Wilderness Society. On behalf of the Wilderness Society, which is had the opportunity to engage on renewable energy issues on public land. Since 2008. Thanks for the opportunity to speak today for the US to transition away from fossil fuels and toward a more equitable, clean energy future. We understand the need for renewable energy production, nationwide, in order to decarbonize. Our public lands can be part of this solution, but we must ensure that the process is just an inclusive, while protecting critical habitat cultural resources and communities the older society supports a comprehensive landscape level, smart from the start, approach to balanced conservation needs with our nation's goal of permitting 25 gigawatts of new renewable energy on public lands by 2025. To that end we support expanding the study area and all 11 Western States while focusing solely on solar energy, and recommend that BLM updates its wind setting criteria separately and an update to the 2005 when PEIS. Additionally, pursuant to NEPA the BLM must ensure that it is making an informed decision by using and carefully evaluating sound scientific data. We believe BLM should keep existing resource-based criteria from the 2012 PEIS to determine exclusion areas as well as any future Designated Priority Areas throughout the West. We also urge BLM to review, update and improve the data sets underpinning existing resource-based criteria. This can help BLM determine the extent to

which the past 10 years worth of Federal and State actions have expanded or amended any areas of critical environmental concern, critical habitat areas poor habitat designated protected areas, cultural and sacred sites, and other important values. In addition, we strongly urge BLM to consider adding more protective resource-based exclusion criteria based on the scientific communities enhanced and updated understanding of resource values across the West. Particularly those data sets that highlight findings from the past decade related to habitat connectivity, wildlife migration, corridors, biodiversity indicators, ecosystem representation, ecological integrity and social vulnerability, among others this will ensure that siting occurs in lower conflict. Lower impact areas of the West to the extent possible. We would also like to underscore the importance of our local community and tribal engagement in every stage of the process. BLM should meaningfully involve frontline communities and tribes at every point in the planning process, including identifying solar energy priority areas and avoiding significant cultural and tribal resources. BLM should also create thoughtful and smart from the start incentives for solar development and designated leasing areas, including former mine lands, brown fields, and other previously disturbed sites. At the same time we believe BLM must raise the bar for entry for projects with invariance areas in order to redirect development toward priority areas. BLM also should consider updating and adding additional rigor to the variance area, permitting process, including adequately disclosing and avoiding cumulative impacts of projects at a landscape scale. Lastly, it is critical that BLM integrates storage and transmission, planning considerations into this new PEIS and encourages solar development in close proximity to existing and plan transmission, infrastructure to avoid unnecessarily disturbing critical landscapes throughout the West. The Wilderness Society will be following up with more detailed written comments on these issues and other questions in the next few weeks. Thank you again for the opportunity to speak today.

**Lee Walston, Argonne:** Great. Thank you, Marcus. Next we have Megan Sahli-Wells.

**Meghan Sahli-Wells, Sierra Club:** I was trying to unmute. Yeah, am I with you now? Thank you. Appreciate that. Good afternoon. Thank you for soliciting our comments and for your time and consideration today. My name is Meghan Sahli-Wells. I was born and raised in Los Angeles, and I grew up going to Joshua Tree, and have continued that tradition with my own 2 children today. I am the National Secretary for the Sierra Club, and a former Mayor and council member of Culver City, California. You'd think I'd know how to use zoom by now. I appreciate the opening comments and presentation, and I really heard, loud and clear that the BLM is interested in balance and collaboration. And so, in that spirit, I would ask that you please keep the desert renewable energy conservation plan in place. The DRECP is the result of 8 years of consultation, dialogue, and understanding, and as such it is a model of the balance and collaboration that I believe we're all hoping to achieve here when I was an elected official. I'm proud to have led Culver City to transition to a 100% renewable energy, which we did back in 2019. And from that point of view I do recognize the need for responsibly and sensibly cited utility scale solar, in addition to the distributed energy, like rooftop, solar and battery storage that we've heard about today. And as a Californian and as an environmentalist, I recognize the need for conservation, habitat protection and our sacred cultural resources. The DRECP is a successful, productive, balanced model, which I strongly encourage you to keep in place, and indeed use as a model for other public lands. Thank you.

**Lee Walston, Argonne:** Thank you, Meagan. Next we have Andy Rieber. Andy, are you available?

**Andy Rieber, Humboldt County, NV:** Oh, yes! Can you hear me? Thank you for the opportunity to comment. I am a public lands consultant, speaking on behalf of Humboldt County, Nevada. So my first comment follows up on Julie from the EPA's comment regarding cooperating agency status and Humboldt County takes very seriously its ability to be a cooperating agency on these NEPA analyses. And while I very much appreciate the BLM's statement that they are interested in engaging, cooperating agencies, I was a little bit dismayed to see all already that the BLM has formulated the purpose and need statement, and is now already almost at the end of scoping. I would just point out that CEQ Regulations, and this would be 40 CFR 1501.7 requires the lead agency to, among other things, determine the purpose and need and alternatives in consultation with any cooperating agency. So because we haven't been engaged as a cooperating agency yet, we did not have an opportunity to help the BLM formulate. So I would very much be interested in some outreach from the BLM. Another comment I would like to leave on behalf of the county. The fact that while the BLM has the responsibility to manage and protect the resource, county governments have the responsibility to protect public health, safety, and welfare. And in view of that, many counties have county permitting authority whether that's conditional use permitting or special use permitting or special use permitting for structures, and that includes structures on the public lands. And some counties, including Humboldt County, have standalone ordinances for renewable energy projects. And this is not to say that these ordinances supersede BLM permitting, they do not, but they are concurrent. So this is just pointing out the fact that those ordinances and permitting authorities of counties do exist. I would also urge the BLM to consider impacts to counties by solar projects on county services, such as law enforcement, maintenance of excuse me if roads, ambulance services, fire services, things of that nature. And last, I would encourage the BLM to include important sage grouse primary habitat areas, in exclusion areas. That's the end of my comment, and I thank you very much for the opportunity.

**Lee Walston, Argonne:** Great. Thank you, Andy. Next we have Brian Baker. Brian, are you available?

**Brian Baker:** Yes, thank you, Brian Baker. I'm president of Apple Valley, California, in the Mojave Desert. I've spent most of my life in California, including over 20 years in desert, here. I've been a servant for the desert all the time. I'm also the chair of the Mojave Group of the Sierra Club, which covers much of the Mojave Desert of San Bernardino County, although I'm not, officially speaking, for the Sierra Club at this point. I was a participant in the hearings and comments on the original DRECP process back in the mid 20 tens, and as anyone who's around at that point could tell you, it was pretty controversial project planning process. Many people wanted more areas open to solar development, some people wanted less, and so it was definitely a compromise that went into the DRECP. And then I also remember, during the last administration, that there was some efforts to reopen it, to revised the plan, and that was also very controversial. So I just would urge the BLM to be very careful in any kind of considerations for changing provisions that currently apply to the area of the DRECP. In fact, I would urge the BLM, if possible, to exclude the area of the DRECP from, for the considerations. There were a lot of good lessons in that planning process that the current effort can use. So I would urge you to look back at that and do take that into account. Thank you very much for your time.

**Lee Walston, Argonne:** Great. Thank you, Brian. Next we have Barbara Millikan. Hi! Barbara!

**Barbara Milliken:** There I am. Good afternoon. Thank you for taking our comments. I must say I've been listening through all the comments, and I agree with virtually all of them. I am a member of the old Spanish Trail Association. It's one of America's national historic trails, and I have been a member of the

Tacopa chapter near Death Valley, near the Nevada border. For at least 15 years, and we have a committee of us, including my husband. I was a board member, he was President. That chapter has now consolidated with the Barstow Chapter, with the Mojave Valley chapter, and we actually GPS'd the old Spanish Trail, the Mule trace not the Wagon Trail from the Nevada border into the Tacopa area and the Armagosa River. I'm also a member of the Sierra Club, The Nature Conservancy, and a number of other organizations that are devoted to environmental preservation, including animals, all wildlife, and the preservation of the landscape. I totally agree with the constant request that the DRECP not be altered I am aware that there are variances that have been considered relating to projects that do fall within the corridor. Established by clinic of the old Spanish Trail in particular, and that the and my position, as well as our chapters position, is this, should not be altered. It's there for a reason to preserve the trail, it's use and artifacts that may be found along the way, and we have found many in our years of walking the trail and GPSing it. With regard to solar in the desert, I know you've been told, and I want to reiterate the desert is not wasteland. It is an incredible environment that should not be disturbed where it is absolutely not necessary. And in line with that I agree with many who have said, do rooftop solar first, it's close to the use in other words, if you put it on a department store in a city you won't need transmission lines. A car across many hundreds of miles of desert, and in that way you eliminate disturbance of the desert area. The release of carbon that's been preserved there for many years, and not released into the environment as well as protection of animals, wildlife and the viewshed, which is important to us with the trail, because there are areas in the national, historic, and recreational layers where you can look for miles and miles and see the trail. And it's around just as it was 100-200 years ago. And this is important, in our busy city lives. I live in Los Angeles, in Venice, and it is such a relief to get out to the deserts and the mountains. I'm a hiker, a backpacker, and have been for many years. Please help preserve these experiences for all of us. Thank you.

**Lee Walston, Argonne:** Thank you, Barbara. Next we have Vicky Hoover, Vicky

**Vicky Hoover:** Hello! Greetings. Yes, my name is Vicky Hoover. I'm from San Francisco, and I'm here to defend the DRECP. I'm not unique in that today. The DRECP took a lot of work to achieve to achieve it. I and countless other volunteers worked hard to get to a result that, while not perfect, is workable and usable and satisfactory. The BLM worked hard to get this result. Don't upend your own agency's work now, for no reason. No good reason. Keep the DRECP intact because it's workable, and took a lot of your own careful work to get to where it is now, and we have no reason to start all over again, and get to a less satisfactory result. Clearly, we do need renewable energy. I know that perfectly well, and we need it in the right places. Now the places where we need it in, and close to urban areas where power will be used may not be on BLM land. But BLM can use its considerable influence as part of the Biden administration to help convince, say, the California Public Utilities Commission not to keep putting major obstacles in the way of people who want to move to rooftop solar, which is what the PUC has been doing. Making it harder for people to pay for you. Rooftop solar. There are also, in addition to rooftops. Considerable other surfaces in that around cities that need urgently should be covered with solar. Obviously, although I'm from San Francisco, I have spent a lot of time in the California, and also Nevada deserts and come to appreciate greatly their habitat value. There seems resources are so many wonderful things about our deserts. I have indeed, for many years, for more than 20 years, annually led service trips with the BLM. To help protect better some of our California and Nevada desert lands. And hey, it is distressing to me to see one part of BLM working hard to protect the lands, and another arm of BLM is making plans to harm and remove some of our best desert habitat lens by industrial scale solar

facilities, which shouldn't be out on our remote habitat lands. So, that's enough for me to say right now. Thank you very much for the opportunity.

**Lee Walston, Argonne:** Thank you, Vicky. Next on our list we have Hannah Tikalsky, Hannah

**Hannah Tikalsky:** Okay, well, I want to thank Vicky for basically starting the frame that I was going to. Enter into, which is really, I feel that BLM, though your remit is over public land, you're so much more than that, and we're all hoping that you can influence our utilities, who are really the players here to ensure that we can use distributed energy resources to make a dent in this 20 gigawatts goal. You know, I'm fortunate that I live in an area and have the, you know, financial reserves to be able to have a solar battery electric vehicle situation, but I am. You know the 0.4%, or whatever it probably is that can have all 3 of those things. And this is because our utilities are not invested on the same goals and the same targets, and are not feeling any pressure except from their shareholders to make changes. So I'd really ask that you think about how to work with other parts of the region - the west region, and try and get our folks who are supposed to be accountable for. You know, the public energy in our areas to work on this with you, and then I also want to thank my friend Jenny for also mentioning that you know there's an ability to do this without making currently wild, or you know, even aggregate that's being farmed with nature. There's many different kind of areas of land that right now are providing ample resources for nature for carbon sequestration, for really valuable native plants. In addition to those animals and pollinators. And I think there's just so much land that's available that we don't have to disturb. That carbon, or that vegetation, or those corridors in order to get this done to the extent, it can't be done through distributed energy resources. So I just really urge you to stick with the DRECP because it was regional and multi-body multi-industry, including nonprofit, including resident, including private, including public and, as everyone has commented, it may not be perfect, but it was collaborative, and it gets it done, and I think if we could just invest even perhaps leveraging public dollars to be able to have that community participation with private public nonprofit partners in that. I think we could really get this done, and we then would not be opening up new problems, such as removing or permanently damaging habitat permanently, releasing carbon that we cannot afford, and overall impacting these landscapes that we all love. So, I thank you very much for the opportunity to provide comments.

**Lee Walston, Argonne:** Great. Thank you, Hannah. Next we have Daryl Gale, Daryl.

**Daryl Gale:** Industrial solar energy will absolutely be necessary to meet our transition away from fossil fuels. However, I am very concerned with the plants, the animals, especially the endangered species, like the desert tortoise, the pristine lands. My strong belief as a Los Angeles resident is, we need to cover the California aqueduct immediately, and oh, the numerous and I mean numerous (in Southern California), industrial warehouses, shipping facilities, The Gazillion parking lots, the stadiums, the colleges, the schools, the houses, and the apartments. First, let's do this first, then we'll start talking about industrial solar in the desert. I am re-muting myself now thank you.

**Lee Walston, Argonne:** Great. Thank you. Daryl. We're getting down to just a couple of individuals left, and I think now is a good time for me to mention that if there was anybody that had previously spoke, and for some reason you feel like you've got more to say or would like to add to your initial comment. You can feel free to raise your hand again. One person, Kevin Emmerich, has already done so for us, but before we go to Kevin I would just like to give others that have not yet spoke to have an opportunity to speak. So, Kevin, if it's okay with you, I will bypass you for now, and go on to Vance, and I believe Ilene, I'm not sure I can't remember if Ilene has already spoke. But let's go to Vance for now and then Kevin



and others that have already provided a comment. So, Vance, would you like to unmute and provide a comment.

**Vance Nobe:** Sure. Thank you so much for your time, and it was a very great presentation and very interesting and very informative, and I appreciate the BLM for putting this together. I also appreciate the opportunity to speak. I'm actually a solar developer. So, my company has been around for 14 years and from my perspective, I agree with everyone that everyone that has spoken. Our big concern is, of course, to really preserve the environment, and one of the ways, of course, is to help with the energy transition by providing solar power. One of the things that many people do not realize is that the entire United States, the electricity that the US uses, solar power right now only provides 3% of the entire grid. It's a very, very small percentage. So in order to get to that energy transition place, we have a lot of hurdles to go through and BLM is just one part of the piece of the puzzle. So it's not the entire solution. But we certainly appreciate the opportunity to work with BLM. One of the other things I wanted to mention is that so the entire electricity. The entire amount of kilowatt hours that the US consumes in a year that would be equivalent to covering about 9 million acres of land, which is 10% of the surface area of the State of Nevada. And the BLM right now, according to the website, manages about 45 million acres of land in just the State of Nevada. So if we were to provide enough solar electricity for the entire US, we would only have to cover about 9 million of the 45 million acres of land in just Nevada. So we're not talking about the other states. So our impact to install solar, to provide power to the grid is actually a very relatively small impact to the total ground surface area. So as a solar developer, we're very, very careful, and we do very extensive environmental surveys on the land because we want to preserve the land and the environment that we're developing solar because that's our whole point of developing solar to begin with so although I really appreciate all the comments. And they're very, very smart and very thoughtful. We want to work with you all, with all the government agencies, and we and definitely work with the counties. That's usually our starting point is working with the counties to see what's the best way to implement solar. And we definitely want to use rooftop systems as much as possible. Rooftops are a great solution. It's just it doesn't provide enough. Typically we cover an entire rooftop of a building, and it provides no more than 20% of the electricity use of that building. So, even if we cover all the rooftops, it's still not going to provide enough power. And that doesn't count industrial like factories and manufacturing and other uses of electricity. So we definitely want to work to help the environment. And we definitely want to work with all the agencies involved to implement solar energy, renewable energy and it is a long, long process. And but I just wanted to kind of give that, you know, perspective. We're far off. We're very far off from getting to that energy transition that we want to get to, and our relevant impact to the land surface is very, very small. When you look at the total land surface that we have available. So again, I appreciate everyone's comments, and I agree with them all. And I just wanted to add my 2 cents to it. Thank you very much.

**Lee Walston, Argonne:** Alright. Thank you, Vance. Let's see. How about Ilene Anderson? If you're available to speak, you can unmute your mic.

**Ilene Anderson, Center for Biological Diversity:** Yeah. Hi! Do you hear me? Great thanks so much. This is Ilene Anderson. I'm with the I'm a senior scientist with the center for biological diversity and we think that the BLM needs to emphasize landscape level smart planning to identify lower conflict lower risk areas for development and areas for protection and exclusion including areas for species, habitat,

climate, resilience, and connectivity. The DRECP provides a good model that should be replicated elsewhere in BLM's planning, as it combines the creation of a conservation strategy, protection of important cultural resources, mostly transmission, planning and other resource values to identify areas forward development in areas for conservation. In addition the DRECP showed that landscape level planning can expedite renewable energy planning, as we've seen as it's been implemented. Well, protecting values of our public lands, for the most part, many of the RMPs that are out there are out of date and have old information and data. And so we're very concerned that the BLM needs to include updated environmental data and analysis from the local level and update the RMPs to reflect the new information and data. If BLM is identifying areas for development at us should also be identifying important areas for protection. The exclusion criteria need to be updated to include important natural and cultural resources. For example, criteria should include core areas for federally listed species that have no federally designated critical habitat. Some of those species have been listed for so long that it's no longer necessary, according to the endangered species Act, to identify critical habitat. Yet these are some of the most imperiled species. So we like to see that included, we'd also like to see habitat connectivity areas included as part of the criteria and employment plant areas is other as well as other resource criteria a more complete list will be provided in our written comments. Of course, the existing transmission should be a factor when considering solar development, but the identification of solar development areas should be driven first by identifying lower conflict lower resource areas and then considering where there's sufficient existing transmission. The BLM should also focus on identifying solar energy priority areas and exclude areas that and minimize designating a lot of variance areas. These areas complicate transmission that the areas, the variance areas complicate transmission planning because they create uncertainty in where transmission should be planned. The BLM should also definitely ensure that tribes are consulted early and often and avoid impacting culturally significant resources and landscaping landscapes, which was part of the problem with the does it renewable energy conservation. Plan but regardless, we still think, that should be used as a model with updates, and it should remain in place. So finally, we believe that our public lines, at least for today, for today. Finally, we believe that our public land should be used for the highest and best use as we're the highest and best use. As a refugia for plants and animals that are also strong, trying to survive climate change and believe that solar energy and energy storage belongs in the already built environment. For all of the benefits that that provides. Thank you so much.

**Lee Walston, Argonne:** Thank you, Ilene. Okay, so, Kevin, I know you previously spoke, but we can circle back around, and if you have more to add to your comment, Kevin Emerich, you may do so now.

**Kevin Emmerich, Basin and Range Watch:** Thank you. Again. My group, basin and range watch. I'm a little disturbed by the individual said we could put 9 million acres of solar in the Nevada. They're currently developing a lot of solar planned and they're reviewing projects for Nevada and all the ones that are reviewing send the energy to Southern California. And for those of us who care about the ecosystems, the cultural resources, and your area wildlife plant life, the sheds, and we feel that a little bit colonialist of California, they want to develop all our land and send all the energy off in this long transmission journey to Los Angeles, and that's where a lot of the comments that I'm hearing about distributed energy really ring in. True, we have a study that says we could put 39 gigawatts of energy just over parking lots, and California alone, and we could deploy even single access tracking to make that even more efficient. Another thing is, I'm hearing a lot of people say that the DRECP should be used as a model for other States, and before we just jump right into that, let's review the history of the original

Western Solar Plan. They really didn't consider community. I've seen a lot of reviews where they've thrown solar right next communities because they feel the area is already disturbed by those people. Most people matter. Actually, a lot of them like Donna and Larry Sharpie. And we're guardians of the desert, for 35 years before they got their ramp surrounded by the desert Sunlight Solar project, and they were growing jojoba. So that that was before the DRECP. I think the Western Solar plan also failed to consider native American interests, and they really overdeveloped the area around Blythe, California, along the Colorado River. And I can remember attending a demonstration with the Interior Secretary and Governor Brown, and they essentially ignored those folks who are actually putting out a demonstration. Another comment is, somebody mentioned the old Spanish National Historic trail, and that had the Federal Parks National Park Service cooperation with it. And there's a 5-mile buffer around it. But in the south Valley there are about 4 or 5 big solar projects going through a variance review, and at this point I would like ask that the barrier solar projects be placed on hold until this plan can be resolved because one solar product called Gemini developed 3 miles of the Old Spanish National Historic Trail, and they had to amend a whole bunch of plans to do that. When people start talking about smart from the start, planning, this is where we start. We need to consider that before we just roll into these solar projects that are again and about it, going to export all their energy to California. What do we get out of it? Because very few of the solar developed? Are offering it to the local towns. There's a lot to be worked out here, and so let's not just put a DRECP in every State. Before we review it let's take a long, hard look at what work and a lot of the DRECP is working and what doesn't work before we try to make that the national model for everything.

**Lee Walston, Argonne:** Great. Thank you, Kevin. Thank you. Again. John Hiatt. Did you have more to add to your previous comment?

**John Hiatt:** Yes, thank you. Like to say that this needs to be part of a national plan for transition to renewable energy, and, as far as I can tell right now, there is no national plan. What we're doing is basically opening up public lands to solar and wind development and sort of just hoping for the best and hoping that it works out. And that's not a very good way to run a country. I'd also like to say that as part of this process, it's really important to preserve ecosystem function wherever solar panels are placed in the desert and other areas and that involves some things which are may not be obvious to everybody. One of the things we have in the desert. Our water call sand transport routes, in which windblown sand is moved from one area to another on a long-term basis. This sand, while a pain in the neck for some people, is really important for some plant species that are absolutely dependent upon wind-blown sand for habitat. So we need to preserve sand corridors and not interrupt those. We need to look at transmission systems and understand how they fit into the system and realize that transmission systems can be as least as destructive as anything else. When it comes to habitat and understand how we're going to deal with certain choke points where, for physical reasons, you have to limit the area available for the transcription lines. Lastly, I'll just like to say that large scale solar panels have a system impact upon drainage patterns. They provide absolutely impermeable habitats. So you're going to increase the amount of runoff when you have heavy rainstorms, we're seeing more solar panels have a significant impact upon drainage patterns. So it's not only of the area where the panels will be placed, but on those areas down gradient where water will drain to, and what that will do and how it will affect those ecosystems. So that's why comments for right now. Thank you.

**Lee Walston, Argonne:** Great. Thank you, John. Let's see. Next we have John Belak, John

**Jon Belak, Audubon Society:** Thank you, Lee, and thanks everybody to the Argonne team and the BLM, and also everybody that had all these great comments today we're going to be a national autumn on society I'm John Belak from the National Audubon Society's clean energy initiative, and just wanted to say that we're going to be submitting detailed comments. But with regard to the DRECP, in addition to echoing the recommendation that other groups have made, that the areas that have been designated in the DRECP should not be changed. The elements of the DRECP that we recommend that the BLM should model for the solar PEIS revision are kind of at a higher level, are setting a planning goal in megawatts to frame that the scope of analysis is necessary like to set the sidebars on how much development is needed second element is to identify data gaps in the environmental baseline data and to fund data collection to build those gaps. Third element is to use the best in the most recent environmental science and analysis. And then the fourth is to consider upgrades in conservation, status and protections of beyond conservation areas. In other words, to identify areas is important for natural resources. At the same time as identifying the priority areas for development. Just wanted to clarify those kind of overarching things that the DRECP did, that we would like you to duplicate for the BLM Solar PEIS. Thank you so much for your work on this, and we look forward to so many detailed comments.

**Lee Walston, Argonne:** Great thanks, John. Looks like Lionel may have another follow up to his previous comment.

**Lionel Mares:** Yes, thank you so much. I just want to say thank you for having this public hearing. I would like to thank the BLM and everyone coming up to speak up, and I just want to add something before I forget. Last month in December, a journalist <inaudible> Gonzalez with KEQB wrote an article about solar energy farms that are booming in the California desert. And here's why environmentalists are concerned. In the article, I'm quoting: "as the States' deserts play a growing part in helping to create the green energy revolution, a backlash is also growing among those who argue that desert wilderness is being sacrificed for Renewable power goals." There's an article on his twitter and on you could do a Google search to learn more. I actually wanted to point that out, if anyone who is curious or wants to learn more about this. Like I said, before I'm all for green energy, I am. The climate Change is a global crisis, but at the same time we had to be very delicate at how we approach solar farms, because at the desert it's not dead. It's alive. There are certain species that thrive on a desert, and if and we are concerned about what impact that these animals or plants or native species may experience that concludes my comment. Thank you. And happy new Year.

**Lee Walston, Argonne:** Thank you. Lionel. Okay, next, we have Lindsay Johansson. Are you available?

**Lindsay Johansson, Idaho SHPO:** Yes, thank you. My name is Lindsay Johansson. I'm the state archaeologist for the Idaho State Historic Preservation Office. And just a couple of things that we wanted to note. I guess one is more of a question. We were assuming that in expanding this study area to include the additional States that BLM will be working to either amend or create a new programmatic agreement based off of the 2012 programmatic agreement and we support that. We think it'd be a good idea, and in general, you know, we think a lot of the stipulations in there could be carried over pretty easily. Another comment we have relates to historic preservation. The plans are based on the current BLM resource management plans, and a lot of ours are fairly old. So we would encourage BLM to revise a lot of Idaho's plans. And my last comment, sorry, I lost my train of thought, there my last comment is that with regard to our cultural resources, we would encourage BLM to also include wind, renewable energy in this, or at the very least kind of begin a similar, you know, planning, scoping process for wind

energy in Idaho. We currently have, you know, new wind projects coming across our desk every week, and a lot of them are on BLM land. What are the biggest ones are, and a lot of them. The planning is in our minds indirect conflict with preservation of our historic resources. So we'd like to see a lot of the provisions in the 2012 programmatic agreement and planning process to that. That avoid areas near significant cultural resources, and especially national historic sites. To be kind of carried over into wind planning, and that's kind of all our comments. Now, like most of the other people, will be submitting written comments as well to kind of expand on some of these topics. Thank you.

**Lee Walston, Argonne:** Great. Thank you, Lindsay. How about Vicky Hoover?

**Vicky Hoover:** Yes, thank you. I spoke before, but I just wanted to say that there's one thought that doesn't seem to have really been addressed in today's comments. Many commenters have spoken about the need, the urgent need, to cover rooftops and other urban services cover our California's aqueduct with solar panels. I certainly agree with that. But, on the other hand, no one has suggested how we're going to pay for that. I know as well as anybody that BLM does not have the money to do all that covering. However, the leaders of BLM in Washington, DC can and should use their influence in the in the administration the in the Interior Department needs to convey to the Administration these needs for Federal subsidies, for urban distributed solar energy. The Feds, for, for example, can help to compensate for profit, utility companies for the revenue that they don't get. When people go to rooftop solar, so that they won't have to impose the penalties. Some people would want to go to rooftop solar. There is a lot the Federal Government must do in order to augment our solar power. The solar energy. We all know we need with the destruction to our desert habitat. Thank you.

**Lee Walston, Argonne:** Great. Thank you, Vicky, and I think that is all for that have raised hands. Is there anybody else that would wish to provide a comment once again. There are several ways to provide a comment. If later on, you feel like you want to say something, you can go to the project website here. That's shown on the screen and also linked in the chat, as was mentioned by BLM earlier the comment period is open through March 1<sup>st</sup>. I'm seeing there are about 83 participants still remaining in in the webinar today, and we've got oh, about 30 more minutes remaining for this room. We're certainly going to be here to field any comments and accept comments but if there are no further comments, maybe we can turn things over to Jeremy and Shellie. Is there anything you'd wish to add?

**Jeremy Bluma, BLM:** I would just like to thank everybody for their engagement on this today, and then hopefully, throughout the process, we do look forward to allow what was alluded to is a lot of written comments and follow up to some of the verbal comments today appreciate all the good things and the good ideas and the flagging of concerns, and really helping to shape this effort. We're happy to stay around. If folks have some more things that they would like to toss out there for our consideration, as we kind of get going on this effort and start putting some shape to this. There will be another virtual presentation tomorrow that will be even, you know. Hopefully, we add on to that what was presented here today, as far as ideas from the public, the presentation will be virtually this same or very similar presentation. I think that we are. We have been interested in hearing more about. You know the different ideas and concerns, and what the agency should be looking at. As far as this effort goes, as far as looking at Solar, and I think that tomorrow's will have a focus. Even, you know, a little bit of a focus on Southern California Southern Nevada, because we know that that has been somewhat of a ground 0 for solar energy development. That's probably where we have the most applications currently, but

certainly we are seeing that expand across the Western States. So appreciate everybody's comments, and thank you, Lee, for facilitating.

**Lee Walston, Argonne:** I think that there is one more hand up. Julie, if you have something to add, feel free to unmute.

**Julie:** Unmute. Here you go. Yeah, you would think that I would have this down by now. Yes, just very quickly, and in the beginning, and I really appreciate it. The focus on the topics that BLM is looking in particular to get feedback from the public and from agencies and other stakeholders on there were, I think, I counted, something like 6 or 7 items, and one of those that you all raised was solar sighting and development on public lands as well as wind development. So just as a suggestion, maybe for tomorrow's presentation or in the chat for this, could you provide a link that would allow folks, the public and myself and others in agencies for information about wind development that is going on BLM lands so that when we do submit written comments, particularly those related to cumulative effects, and thinking about cumulative effects of this development and potential conflicts. That it, we would have a quick resource, like you did with the other resources that are very helpful, that you provided the links. And that's it.

**Lee Walston, Argonne:** Thank you for that, Julie. We'll see what we can pull together. And if we do, yeah, we will post all that information on the project website for anybody who's interested in the same. So Thank you.

**Jeremy Bluma, BLM:** Appreciate that this is a very important effort for the Bureau. We're taking our challenge here very seriously, like we need to plan for different uses across the public clients. But we need to make sure that we're doing it as best we possibly can. So thank you so much for your engagement today. Shelly, any last words from you?

**Shellie Sullo, BLM:** I just appreciate everybody being here and like thank you for your facilitation, and definitely, we are getting a lot of input I'm monitoring the planning site and mostly monitoring the BLM, and we have a lot of good comments coming in. So I appreciate everybody's public involvement.

**Jeremy Bluma, BLM:** Thank you. Shelley. Thank you all well, your. I think we're mostly concluded here, though we will continue to just kind of remain on standby. If folks want anything else to opportunity to speak so with that I'm just going to turn off my camera on mute. But if there is nothing else, I think we're relatively closed out.

**Lee Walston, Argonne:** Sounds good. So for those of you that are still logged on no requirement to stay. But we will be here until 4:30 central, so about 30 more minutes. But otherwise thank you all for joining

I'm going to turn my camera off for just a moment, but we will be here if anyone has comment. Okay. It is now 3:30 mountain time, and just chiming in to notify everyone that we are now going to close out the meeting. Thank you all for attending.