



*Shaping the Future of the West*

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August 13, 2009

Teri Raml  
Phoenix District Office Manager  
BLM Arizona State Office  
One North Central Avenue, Suite 800  
Phoenix, AZ 85004-4427

Re. Restoration Design Energy Project, Call for Projects

Dear Ms. Raml:

The Sonoran Institute, The Wilderness Society, Sierra Club, Arizona Wilderness Coalition, and Tonopah Area Coalition are pleased that the Bureau of Land Management (BLM) is providing an additional opportunity to consider siting of renewable energy projects on BLM lands through its National System of Public Lands Restoration Design Energy Project.

In response to the BLM's request for project proposals, we looked at three parcels of land identified by the BLM as candidates for land disposal in the Agua Fria National Monument and Brandshaw-Harquahala and the Sonoran Desert National Monument-Phoenix South resource management plans which may be worthwhile candidates for solar energy projects. We selected these parcels because they met the BLM's Solar Study Area criteria for solar resource, slope, parcel size, and proximity to existing utility corridors. Also, because of the BLM criteria for identifying parcels for disposal, such parcels also meet the Restoration Design Energy Project's criteria for parcels that "do not have higher resource values and may be suitable for energy development."

We conducted rapid site assessments for these parcels (site assessment for each site are included as an attachment). These assessments identified a number of issues that will require further investigation by the BLM should the agency decide that these sites merit consideration as project sites. Rather than get into a detailed discussion of the individual sites, we would like to highlight issues that we believe will likely cut across these sites and other project proposals that the BLM may assess (highlighting these issues may contribute toward the development of criteria that the BLM can use in the selection of proposed projects to evaluate):

- Locating near other approved or proposed solar projects – There are a number of solar projects likely to be sited on private and state trust lands that are near BLM lands. There is value in having the BLM assess proposed projects near these sites, both for the cumulative impact analysis that would result and also because it may encourage

the location of sites in close proximity to each other, thereby reducing the cost and environmental impacts associated with dispersed siting and transmission and other infrastructure development.

- Aligning with other planning efforts – Proposed solar projects may conflict with local land-use plans, as well as regional transportation and utility corridor planning. Consultation with local government and state agencies is critical.
- Engaging Neighboring Developers – To the extent that proposed projects are adjacent or close to land that has been platted for development, there may be opportunities to explore with landowners their interest in promoting solar power on BLM lands for their development projects.
- Engaging Federal Facilities – Same point as above. The BLM may be able to provide land for siting and the federal agency housed at the facility secures funding for the solar power project from the Federal Energy Management Program.
- Engaging Other Landowners – We note that landfills, CAP canal, correctional facilities, communication sites, private businesses and other facilities may be interested in siting smaller-scale power generating opportunities on neighboring BLM lands.
- Siting Near Adjacent Power Plants – Locating near existing power plants may offer opportunities to take advantage of existing infrastructure and water resources, such as treated effluent to cool solar plants.
- Encouraging Low-water Use Project – We note that water use by solar projects is likely to emerge as a serious concern for any proposed project in Arizona. We would encourage the BLM to establish some additional criteria for proposed projects that encourage low- or no-water use proposals.

We thank you for the opportunity to share our thoughts on this promising initiative. We would be happy to discuss the disposal sites we assessed, as well as any other candidate project sites you are considering.

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