



# Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

For America's Heritage

January 23, 2012

Robert Abbey, Director  
Bureau of Land Management  
1849 C Street NW, Room 5665  
Washington, D.C. 20240

Dear Director Abbey:

The Public Lands Foundation appreciates the commitment you and your staff, along with the Department of Energy and Argonne National Laboratory, have made by providing a supplement to the Draft Programmatic Environmental Impact Statement (DPEIS) on Solar Energy Development in Six Southwestern States. We believe it presents a clearer picture of what is proposed and it has improved by keeping projects in low impact zones.

As you know, the Public Lands Foundation is a national non-profit conservation organization formed in 1987 that advocates and works for the retention of the National System of Public Lands in public hands, professionally and sustainably managed for the responsible common use and enjoyment of the American people. Our members are predominantly retired former BLM employees with many years of experience in natural resources management.

On March 17, 2011, we provided comments on the Solar Energy DPEIS. We are pleased to see that many of the suggestions we made at that time have been taken into consideration and have resulted in what we believe are positive changes in the revised Preferred Alternative.

We are pleased to see that the Preferred Alternative has been reduced from nearly 22 million acres to 17 solar energy zones totaling about 285,000 acres potentially available for development. We see this as a much more reasonable approach that will concentrate development in low-impact areas and minimize resource conflicts.

We support the establishment of a process for adding new zones in the future. And, we are pleased to see that the BLM is undertaking a rulemaking process to establish a competitive leasing process for all solar and wind development.

We also are pleased to see that the Arizona BLM's Restoration Design Energy Development Project will be incorporated in the Solar Energy Program. We again suggest, however, that the Arizona approach be applied for areas outside the solar energy zones in all six states; not just Arizona. As we stated in our previous correspondence, this approach considers suitable disturbed lands across all ownerships and is a much better approach for considering additional new development areas. This approach is very reasonable, focuses on disturbed lands, and will provide greater certainty for potential developers by eliminating much of the conflict.

Thank you for the opportunity to provide input.

Sincerely,

Henri Bisson, President