



SOCIETY FOR AMERICAN ARCHAEOLOGY

April 13, 2011

Solar Energy Draft PEIS
Argonne National Laboratory
9700 S. Cass Avenue
EVS/240
Argonne, IL 60439

VIA online: <http://solareis.anl.gov>

Re: Scoping Comments of the Society for American Archaeology (SAA) on the Draft Solar Energy Programmatic Environmental Impact Statement

To Whom It May Concern:

The SAA endorses the letter sent by the National Trust for Historic Preservation concerning the Programmatic Environmental Impact Statement (PEIS) to evaluate utility-scale solar energy development on Bureau of Land Management (BLM) holdings in six southwestern states. We take this opportunity to provide additional comments about this PEIS.

The SAA is an international organization, founded in 1932, dedicated to research, interpretation, and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges, universities, museums, governmental agencies, and the private sector. SAA has members in every state within the United States, as well as in many other countries around the world.

In addition to the issues articulated in the letter sent by the National Trust for Historic Preservation, the SAA has several additional concerns—

- The existing documentation of historic properties was only minimally used in developing Solar Energy Zones (SEZs). Existing Class I reports were apparently systematically consulted in Utah but not in the other states involved in the project. As a matter of policy, SAA encourages the thoughtful use of existing archaeological data in planning documents. There is no indication, however, that the draft PEIS drew on computerized state archaeological site files in the designation of SEZs and excluded lands, or in the environmental analysis.
- The DPEIS does not adequately recognize that maximal re-use of degraded lands will reduce impacts to historic properties and natural resources. We think the DPEIS should have systematically included information on degraded lands in the process of identifying SEZs, and should use stronger language in requiring developers to consider use of degraded lands as a mitigation measure.
- The purpose and need statement is narrowly drawn and thus precludes the analysis and discussion of real alternatives, such as (1) increased emphasis on the use of privately owned and degraded lands and (2) importance of energy conservation and “distributed

generation” in meeting future energy needs. SAA suggests that BLM, as the premier Federal land-managing agency, should consider all reasonable alternatives, especially when these could result in the preservation of relatively pristine public lands.

- The DPEIS, especially the Executive Summary, should more precisely describe the tiering process and should clearly state that NEPA and Section 106 reviews will be required for all project-specific applications.
- The DPEIS contemplates offering lands in SEZs for development through a competitive process. The SAA recommends that if a competitive process is developed then plans for the identification, evaluation, and treatment of historic properties be required in the bid packages and be part of the selection criteria.
- The SAA strongly recommends that the DPEIS should require, not just recommend, historic property mitigation procedures. As an example, the DPEIS states that Class III surveys “should” be done. To effectively manage historic properties, a mitigation measure must state that it “will” be done.
- The SAA believes that the DPEIS mitigation analysis should recognize the potential that buried archaeological sites will be impacted by solar energy development, and therefore recommends that an adequate geo-archaeological investigation be required for each project as a mitigation measure.
- The SAA is concerned that government-to-government consultation with tribes was not adequate to identify specific information about project impacts on traditional cultural properties. There will be significant auditory and viewshed disruptions near sacred lands and traditional cultural properties, as well as impacts to Native American trails such as the Salt Song Trail in the Riverside East SEZ. How solar energy development will identify and mitigate the cairns, cleared areas, and rock art resources associated with Native American traditional cultural properties is not adequately addressed. Further attention is also needed for the water and plant resources associated with SEZ developments.
- The SAA notes that under both action alternatives SEZ's may be enlarged, reduced, abandoned, or added to, but there is minimal discussion about how alteration to the proposed SEZ's would be handled in the EIS process or once construction of facilities is initiated. This shortcoming needs to be addressed.

In closing, the SAA expresses concern that the analysis of historic properties in the designation of the SEZs does not adequately identify significant cultural resources that may be impacted by the development of solar energy facilities. We therefore recommend that the DPEIS not be used to circumvent existing compliance procedures for considering the impact of solar development projects on historic properties eligible for the National Register of Historic Places.

Sincerely,



William F. Limp, RPA
President, Society for American Archaeology