



BOARD OF SUPERVISORS COUNTY OF INYO

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March 29, 2011

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

RE: Draft Solar PEIS

To Whom It May Concern:

Inyo County has reviewed the Draft Solar Programmatic Environmental Impact Statement (PEIS) and is supportive of this effort by Bureau of Land Management (BLM) and Department of Energy (DOE) to encourage and streamline solar energy development in California and the southwest.

Inyo County is particularly supportive of statements within the PEIS, such as found in Chapter 2, which note that additions to the proposed Solar Energy Study Areas/Solar Energy Zones (SEZ) are likely to be considered at a future date. Since becoming involved in the PEIS process in July of 2009, Inyo County has consistently requested that the County be included as a site for such Solar Energy Study Areas/SEZs.

As noted in our comment letter of July 28, 2009, there are PEIS-proposed Solar Energy Study Areas immediately adjacent to Inyo County across the California state line in Nevada. The County requests that the extensive BLM lands within its own borders – which contain the same excellent solar development potential as the adjacent Nevada BLM lands – be identified and targeted as Solar Energy Study Areas/SEZs in future planning.

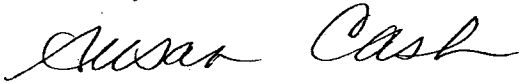
Significantly, while BLM's preferred alternative is the Solar Development Program rather than the SEZ Program, the County notes that this action alternative also excludes lands the County has identified as appropriate for renewable energy development (refer to attached). The County's General Plan encourages the sound development of energy resources on federal lands within the County, and maintaining and expanding access to federal lands for those purposes (Policy Gov 10-1). The County notes that, not only are areas identified by the County as highly appropriate for solar energy development not included as SEZs in the PEIS, but some of those areas are specifically excluded from consideration for solar energy development. At this time, the PEIS is not consistent with the County's plans and policies.

Accordingly, Inyo County requests additional and intensified coordination with the BLM to address and resolve the inconsistencies between the PEIS and the Inyo County General Plan and approved policies. In accordance with 43 C.F.R. 1610.3-1(f), Inyo County hereby informs the BLM of the specific inconsistencies between Inyo County plans and policies and the PEIS. The County requests staff-to-staff meetings to address these inconsistencies and, ideally, to resolve them. It is the County's position that the draft PEIS does not adequately identify and address these inconsistencies and the possible resolution of them.

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Thank you for your attention. Please contact the County's Administrative Officer, Kevin Carunchio, at (760) 878-0292 at your earliest convenience to arrange for coordination.







Sincerely,



Susan Cash, Chairperson
Inyo County Board of Supervisors

Attachment: Map Comparing PEIS alternatives to Inyo County Renewable Energy General Plan Amendment
Overlay

cc: Board of Supervisors, Inyo County
Kevin Carunchio, County CAO
Randy Keller, County Counsel
Joshua Hart, Inyo County Planning Director
Bob Abbey, BLM
Jim Abbot, BLM
Ashley Conrad-Saydah, BLM
Sara Quinn, BLM
Greg Miller, BLM
Linda Resseguie, BLM
Clare Laufenberg Gallardo, California Energy Commission
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties

-  DRAFT Renewable Energy General Plan Overlay
-  Solar Development Program Alternative
-  No Action Alternative
-  Inyo County Boundary
-  County Boundaries
-  Roads

