



Planning Department
168 North Edwards Street
Post Office Drawer L
Independence, California 93526

Phone: (760) 878-0263
FAX: (760) 878-0382
E-Mail: inyoplanning@inyocounty.us

Water Department
336 South Jackson St.
Post Office Box 337
Independence, California 93526

Phone : (760) 878-0001
Web : <http://www.inyowater.org>

April 21, 2010

BLM, Las Vegas field Office
Attn: Greg Helseth
Renewable Energy Project Manager
4701 N. Torrey Pines Drive
Las Vegas, NV 89130

Re: Draft Environmental Impact Statement for the Amargosa Farm Road Solar Energy Project, DES 10-10

To Whom It May Concern:

Thank you for the opportunity to provide input regarding the draft Environmental Impact Statement for the Amargosa Farm Road Solar Energy Project (DEIS). The County Board of Supervisors has consistently expressed its support for appropriate renewable energy projects, and encourages smart and sustainable economic development. However, the DEIS is flawed in several respects, which should be addressed in the final EIS or a recirculated DEIS. The following bullets summarize the Inyo County Departments of Water and Planning comments regarding the DEIS.

- **Table 2-5.** Under Water Resources, the section that should discuss the wet cooled alternative discusses the dry cooled alternative. This is possibly an editorial error. In any case, the wet cooled alternative's impact on water resources should be presented.
- **Section 4.4.** We recognize that the USGS Death Valley Regional Flow System Model is the best available tool for conducting an analysis of the potential impact of the project on regional groundwater resources. However, as acknowledged in the DEIS, because of the regional nature of the model, the large cell size, the regional scope of the calibration data set, potential inaccuracies in the historic pumping data set, and simplification of the geology, the model's ability to accurately render water level changes at Devils Hole is limited. We urge you to treat the model results cautiously, to require as mitigation a groundwater monitoring program that will detect any adverse impacts to groundwater levels or flows early, and reduce groundwater extraction in the

event that impacts to groundwater resources and groundwater dependent resources become foreseeable.

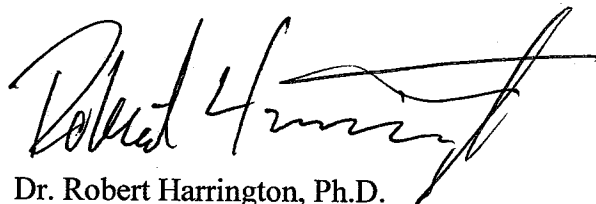
- **Section 4.2.2.** The analysis of the impact of the wet cooling alternative on water resources is inadequate, and if this alternative is selected, the DEIS must be revised and recirculated. It is assumed that 4,600 acre-feet per year (afy) of existing water rights could be acquired and used for the project with no impact to water resources. This conclusion rests on the assumption that any rights so acquired are currently being fully exercised, and that the transfer of those rights to the project would not affect the hydrology of the basin in any way. The location and status of the groundwater rights that would need to be acquired to implement the wet cooled alternative is not identified in the DEIS, therefore it cannot be concluded based on the information in the DES that those rights are presently being fully exercised. Given the practice of periodically fallowing alfalfa fields, it is likely that rights held by Amargosa Valley irrigators are not fully exercised every year. To evaluate the potential impact of the wet cooling alternative on water resources, a model scenario similar to one done for the dry cooling alternative should be developed: 2003 pumping plus an additional 4,600 afy extracted from wells in the vicinity of the project for the period 2010 - 2039. This model scenario should be used to evaluate the effect of project on Devils Hole water levels, and on groundwater discharge in the Furnace Creek area of Death Valley National Park. A credible analysis of the wet-cooling alternative may reveal significant impacts, thereby supporting the preferred dry-cooling alternative.
- **Section 4.11.2.** It is noted that the wet cooled alternative would require 840 acres of irrigated land to be fallowed. Such a large area of permanently fallowed land is potentially an impact to air quality due to blowing dust. We are concerned with this potential impact due to the project's location adjacent to Death Valley National Park.

Thank you for the opportunity to comment on the DEIS. It is recommended that the dry-cooled alternative be adopted. You may call Joshua Hart at (760) 878-0263 or email him at jhart@inyocounty.us, or Dr. Harrington at (760) 878-0001 or by email at bharrington@inyocounty.us, if you have any questions. Please send any future notices regarding actions that may impact the County to the Planning Department's attention.

Sincerely,



Mike Conklin
Planning Department Director



Dr. Robert Harrington, Ph.D.
Water Department Director

cc: Board of Supervisors; Kevin Carunchio, CAO; County Counsel; Greg James; Michael King; Public Works Department; Death Valley National Park; file