

Thank you for your comment, Paul Whitworth.

The comment tracking number that has been assigned to your comment is SolarM60179.

Comment Date: September 10, 2009 12:33:43PM  
Solar Energy Development PEIS  
Comment ID: SolarM60179

First Name: Paul  
Middle Initial:  
Last Name: Whitworth  
Organization: LightSource Renewables, LLC  
Address: 9151 Rehco Road  
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Address 3:  
City: San Diego  
State: CA  
Zip: 92121  
Country: USA  
Email: paulwhitworth@lsrenew.com  
Privacy Preference: Don't withhold name or address from public record  
Attachment: Palo Verde PEIS Consolidated.pdf

Comment Submitted:

Please see attached letter. Thank you.



9151 Recho Road  
San Diego, CA 92121

September 10, 2009

Solar Energy Development Programmatic EIS  
Argonne National Laboratory EVS/900  
9700 S. Cass Avenue  
Argonne, IL 60439

RE: Comments On Solar Development & Study Areas, Solar Programmatic EIS (PEIS)

Dear Sir / Madame:

LightSource Renewables, LLC ('LSR') is a utility scale solar energy developer focusing on solar development in California and Arizona. LSR takes great care in its site selection process to identify project sites that minimize the impacts of solar projects on surrounding lands and communities. LSR is writing this letter because it appears, based on the map published by the BLM titled "Solar Energy Study Areas in Arizona", that an excellent potential solar site has been omitted from the PEIS (Attachment 1).

One of LSR's target sites ('Target Site') is in Arizona on BLM land near the Palo Verde Nuclear Facility on the west side of Phoenix. The legal land description for the Target Site is: T1N R7W sections 33, 34, 35 and T1S R7W sections: 1 (south half), 3, 4, 5 (east half), 8 (east half), 9, 10, 11 (federal lands only), 12 (north half). See Attachment 2 for a map of the Target Site.

LSR believes the Target Site is well suited to solar development:

- The area of the Target Site is an existing hub for electricity generation.
  - There are four large power plants already operating in the area (see Attachment 3):
    - 4,000 MW Palo Verde Nuclear Plant, 3 miles to the north east
    - 585 MW Dynegy Arlington Plant 1.5 miles east
    - 1,200 MW Sempra Mesquite Plant 3 miles east
    - 1,060 MW APS Redhawk Plant 4 miles east
  - There are at least two solar projects planned on nearby private land
    - LS Power: 3,500-acre solar thermal plant south of the Target Site
    - Sempra Mesquite Solar: 50 to 100 MW PV solar plant a few miles east of the Target Site

- The Target Site is close to large scale transmission infrastructure:
  - Four miles from the Hassayampa substation, which is a 500 KV substation with ability to deliver power throughout the southwestern United States
  - High voltage power lines (500 KV Devers-Palo Verde power line) cross the project site
- The Land at the Target Site is well suited to solar development:
  - Flat land with a slight south slope
  - The Target Site is not in or adjacent to designated critical habitat, special management areas, wilderness study areas or Areas of Critical Environmental Concern (ACECs)
  - Project Site has good availability of ground water in the Hassayampa sub-basin compared with the Harquahala solar development area

According to the map published by BLM on June 5, 2009 this Target Site has not been included in the BLM Lands Being Analyzed for Solar Development. For the reasons described above, LSR believes this area should be studied. Therefore, LSR would like to make the following requests:

- The “BLM Lands Being Analyzed for Solar Development in PEIS” be expanded to include the Target Site listed above
- The Gillespie Solar Energy Study Area be expanded to include the Target Site listed above.

Thank you for your assistance in this matter. We welcome the opportunity to discuss the contents of this letter with BLM (or the project team at Argonne National Laboratory) at its convenience. We can be reached at [paulwhitworth@lsrenew.com](mailto:paulwhitworth@lsrenew.com).

Sincerely,



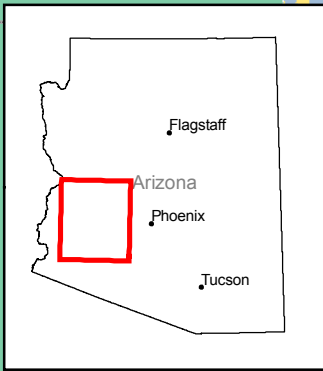
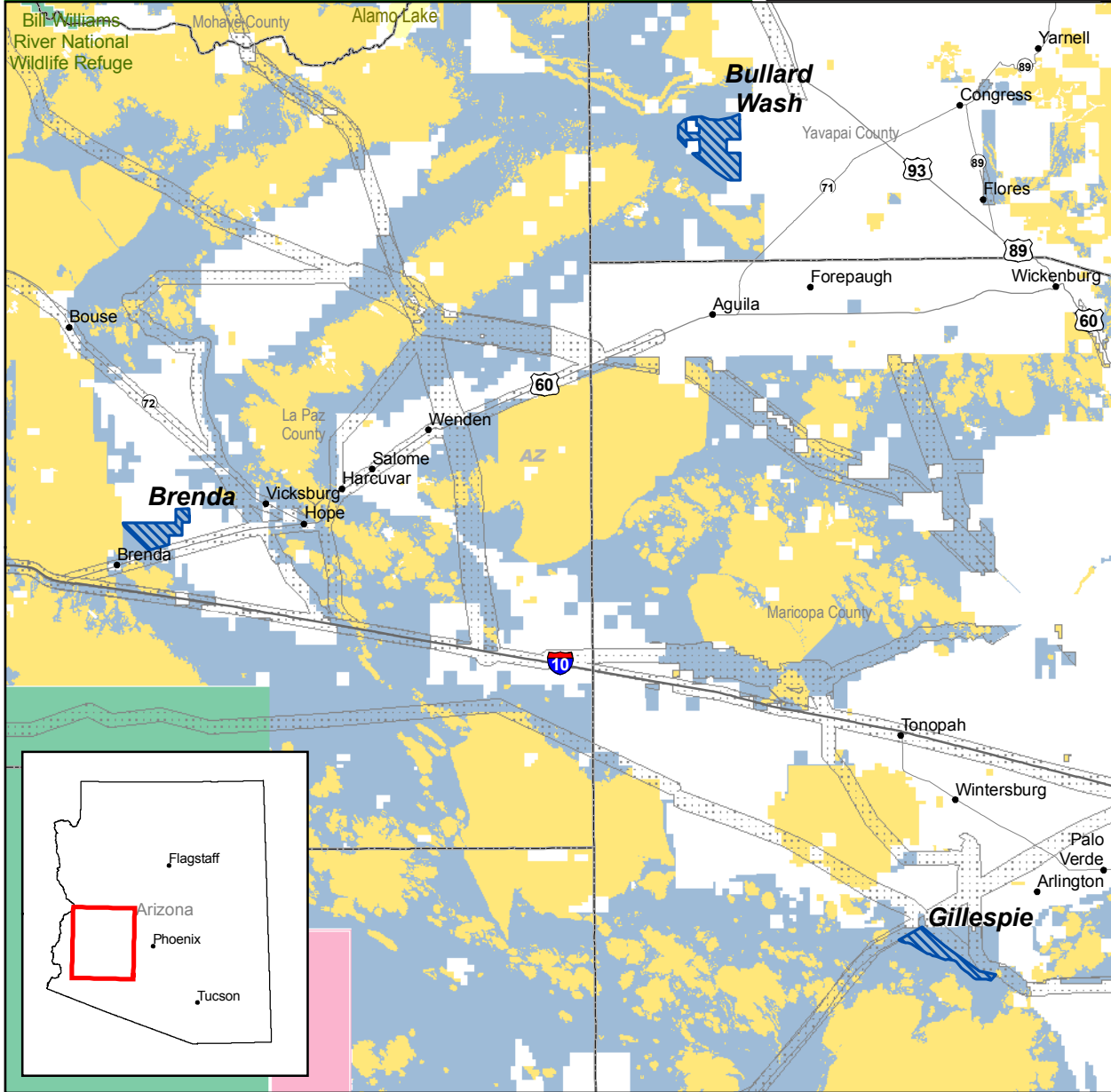
Paul Whitworth  
Senior Vice President

# Solar Energy Study Areas in Arizona

Map Prepared June 5, 2009



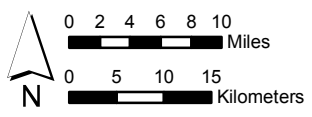
Property of the U.S. Departments of Energy and the Interior  
for Use in Preparation of their Programmatic Environmental Impact Statement  
to Develop and Implement Agency-Specific Programs for Solar Energy Development



**Surface Management Agency**  
As of 3/26/2009

Tribal Lands	DOD	NPS
BLM	DOE	OTHER
BOR	FWS	USFS

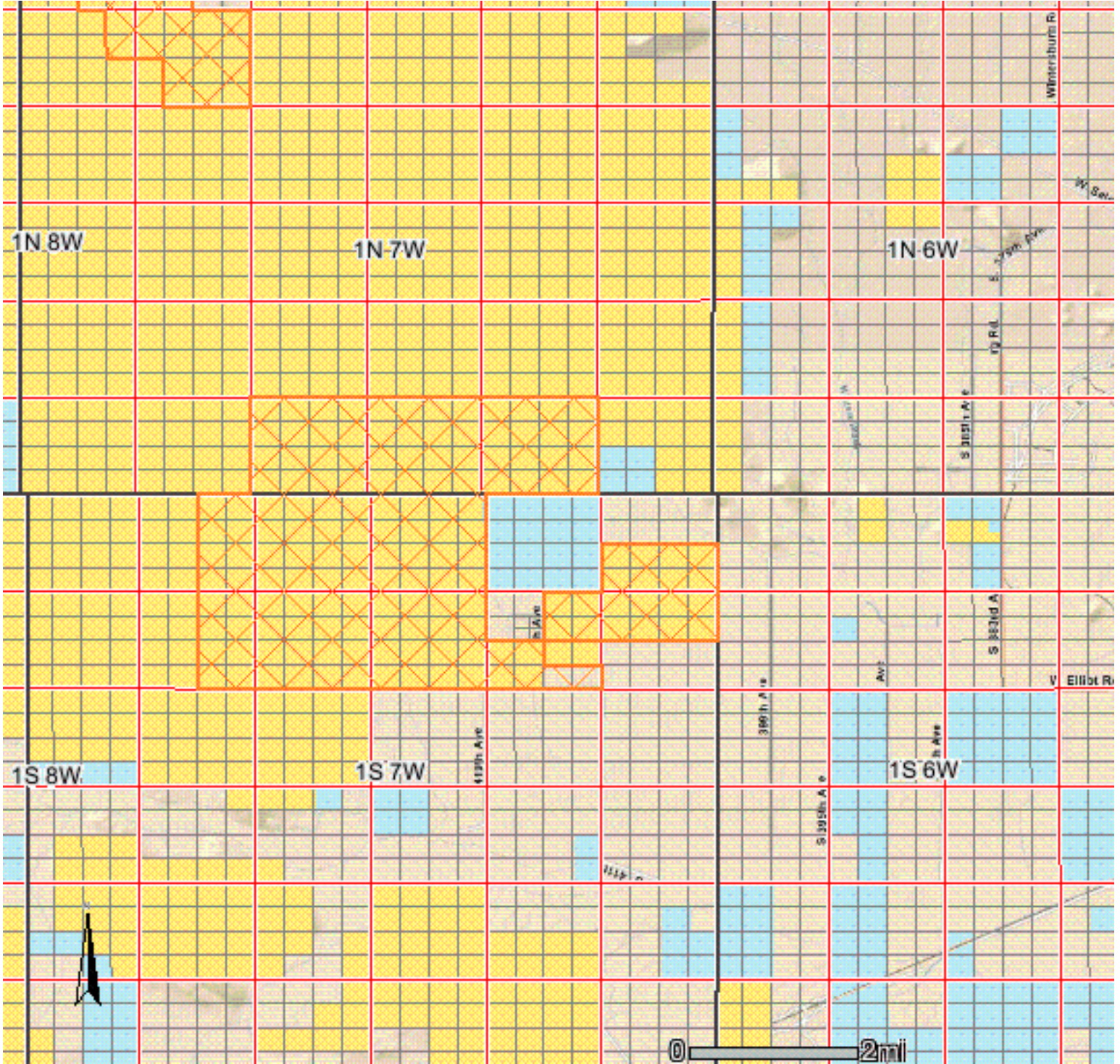
- State Line
- County Boundary
- Solar Energy Study Area (As of 6/5/2009)
- Existing Designated Corridor (See Note 2) (As of 6/5/2009)
- BLM Lands Being Analyzed for Solar Development in PEIS (As of 6/5/2009)



NOTE 1: Revisions to the National Landscape Conservation System included in Public Law 111-11 are not yet reflected in this map.  
NOTE 2: Designated Corridors are developed for federal land use planning purposes only and are not applicable to state-owned or privately-owned land. SOL142



# Target Site Map

















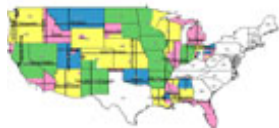



9/8/2009

No warranty is made by the BLM for the use of the data for purposes not intended by the BLM.



# Legend

Downloadable PLSS Data			
Townships(BLM) 	Township Boundaries 	Township Labels 	Sections 
Reference Themes			
State Boundaries 	Roads 	Major Roads and Highways 	County Boundaries 
Lakes 	Rivers 	Urban Areas 	National Forests 
Base Maps			
Shaded Relief 	USGS Topos 	Ortho Aerial Photography 	
Surface Management Agency 	PLSS Principal Meridians 	No Base Map 	



9/8/2009

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