

Thank you for your comment, eleanor clark, M.D..

The comment tracking number that has been assigned to your comment is SolarM60204.

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Solar Energy Development PEIS  
Comment ID: SolarM60204

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Attachment: Hualapai Tribal Nation Dept of Planning and Econ Devel0001.pdf

Comment Submitted:

The study areas should not impact ground water usage! The types of CSP Plants that require water cooling are totally unacceptable in an area that is already arid and tapping into the aquifers. At the expense of efficiency the dry cooled CSP Plants must be studied so as not to further deplete our water for the future generations. If we are to allow the BLM to use "OUR" land for "RESEARCH" it must be based on the most modern and eco friendly CSP plants that can be designed! Rather than rubber stamp large scale industrial CPS water guzzling applications to consume our PUBLIC LANDS and resources! Do NOT authorize BLM land for industrial use without NOTIFYING residents in the surrounding counties of your intentions as many of us own property adjacent to BLM land and do NOT want to donate it to line the pockets of the entrepreneurs and money mongers! Check out the proposed Hualapai Solar-340MW-CSP-wet cooled-Kingman, Az area project! Jack Ehrhardt, Director of the Hualapai Tribal Nation, Department of Planning and Economic Development has written a letter dated 08/24/09 regarding this abomination to the Dept of Energy-Western Area Power Administration. This project is slated for Peach Springs! NZ Legacy is currently seeking "Special Use Permits" to study erection of a 500MW Wind/Solar Plant in Navajo County, AZ encompassing 58 sections or 1.2 million acres! The BLM should coordinate their efforts with the Arizona Department of Environmental Quality (ADEQ) and the Arizona Department of Water Resources (ADWR). The BLM needs to refrain from authorizing or trading OUR PUBLIC LAND for the financial benefit of a few-- at the expense of MANY and our FUTURE ENVIRONMENTAL RESOURCES!  
Respectfully, Eleanor A. Clark, M.D.

The Great Spirit created Man and Woman in his own image. In doing so both were created as equals. Both depending on each other in order to survive. Great respect was shown for each other; in doing so, happiness and contentment was achieved then, as it should be now.

The connecting of the Hair makes them one person: for happiness or contentment cannot be achieved without each other.

The Canyons are represented by the purples in the middle ground, where the people were created. These canyons are Sacred, and should be so treated at all times.

The Reservation is pictured to represent the land that is ours, treat it well.



The Reservation is our heritage and the heritage of our children yet unborn. Be good to our land and it will continue to be good to us.

The Sun is the symbol of life, without it nothing is possible - plants don't grow - there will be no life - nothing. The Sun also represents the dawn of the Hualapai people. Through hard work, determination and education, everything is possible and we are assured bigger and brighter days ahead.

The Tracks in the middle represent the coyote and other animals which were here before us.

The Green around the symbol are pine trees, representing our name Hualapai - PEOPLE OF THE TALL PINES -

**Hualapai Tribal Nation**  
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Comments; Department of Energy-Western Area Power Administration-Phoenix Arizona, August 24-09

Re: Hualapai Solar-340 megawatt –concentrated solar-wet cooled- Kingman Arizona area

Traditionally the Tribe has always been conscientious environmental stewards of their ancestral land and this includes the whole Hualapai Valley that this project is proposed in. The impacts and Cultural Concerns of the Power Plant are described by the Hualapai Tribe T.H.P.O.

Environmental and long term impacts to this style of project are also a concern. While solar energy is the absolute best energy source for meeting Federal mandates and State Renewable Energy Portfolio Standards, the water consumption required in this full wet cooled power plant is irresponsible to approve when dry cooled or hybrid technology is available to use with minimal energy production loss. All Federal Agencies including the Hualapai Tribe are required to use B.A.C.T., Best Available Current Technology including L.E.E.D., Leadership Energy Environmental Design, in deploying new capital projects. The Hualapai Tribe has exceeded L.E.E.D. in many cases and continues to excel in complying with responsible Environment Design and local Environmental stewardship.

The United States Congress requested of U.S. Department of Energy a, "Concentrating Solar Power Commercial Application Study: Reducing Water Consumption of Concentrating Solar Power Electricity Generation". Please reference this whole 24 page report , page 5 last paragraph "Air cooling [dry] and wet/dry hybrid cooling systems offer highly viable alternatives that could reduce the total water usage of steam-generating CSP Plants by 80 to 90% at a penalty in electricity cost in the neighborhood of 2 to 10% ,depending on plant location and other assumptions." The document is designed to enlighten and empower agencies to understand that we can embrace the new solar technology and still be responsible stewards to our Natural Resources, including the protection of the unnecessary waste of our valuable

underground water resources .Please require this applicant to use the Department of Energy's recommendations in Air cooling technology that are part of current water conservation measures. By not requiring them to be dry cooled is like allowing a new car to be built without a catalytic converter because it will get better gas mileage. We simply do not do that anymore. Please recognize that in the Mohave County General Plan, policy requires dry cooling for power plants within its County and it violates some Arizona State law to give approval action against a County Plan. All energy projects when looked at from and especially from a N.E.P.A. perspective have this responsibility.

The Hualapai Tribe has asked the applicant to participate in a regional area transmission interconnect meeting to consider best benefits for all new planned projects in the area, including and especially renewable projects. Four new projects are proposed in the immediate area including the Hualapai Tribes proposed 150 megawatt wind farm. We have not heard back from them on this and believe it is significantly important to have this regional collaborative planning to consider joint cost saving and good regional long range energy development planning. We request these meeting for this planning be part of the approval process and be administered by W.A.P.A with reasonable accountability and benefits marked.

We thank you for the opportunity to give this input and look forward to the exciting new times in this paradigm shift to new clean renewable energy development .

Respectfully Submitted



Jack Ehrhardt Director