



BIGHORN-DESERT VIEW WATER AGENCY
A PUBLIC AGENCY

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September 14, 2009

Solar Energy PEIS
Argonne National Laboratory
9700 S. Cass Avenue -EVS/900
Argonne, IL 60439

Subject: Scoping Comments on the Solar Energy Study Areas for the Solar PEIS

Thank you for providing an extension to the comment period for public responses to Solar Energy Study Areas for the Solar PEIS to September 14, 2009. According to maps prepared July 21, 2009 for the U.S. Department of Energy and Interior it appears that "light blue" lands, in the area of Johnson Valley, exist within the Bighorn-Desert View Water Agency service area (see attached maps) and these "light blue" areas are identified as "BLM lands being analyzed for Solar Development in PEIS".

We were alarmed to discover the California Energy Commission CREZ Refinement Matrix is silent regarding water resource availability and impacts related to the development of utility scale solar fields (see attached letter). It is our understanding that utility scale solar fields require large amounts of water for operation and maintenance and with limited groundwater supplies these projects could be considered unsustainable over time. The Bighorn-Desert View Water Agency service area is not built-out, and some groundwater sub-basins are in overdraft now. In fact, the agency is aggressively pursuing artificial recharge facilities to percolate entitlements from the State Water Project to better manage the local resources into the future for our customers.

Bighorn-Desert View Water Agency perceives that groundwater resources tapped for large utility scale solar energy development is not a beneficial use of the public trust resource managed by BDVWA for the citizens of this community. It is simply a trade, green power in exchange for groundwater depletion.

We respectfully request that the "light blue" areas be reevaluated in light of the lack of groundwater resources and be dropped from the study and off the associated maps.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marina D. West".

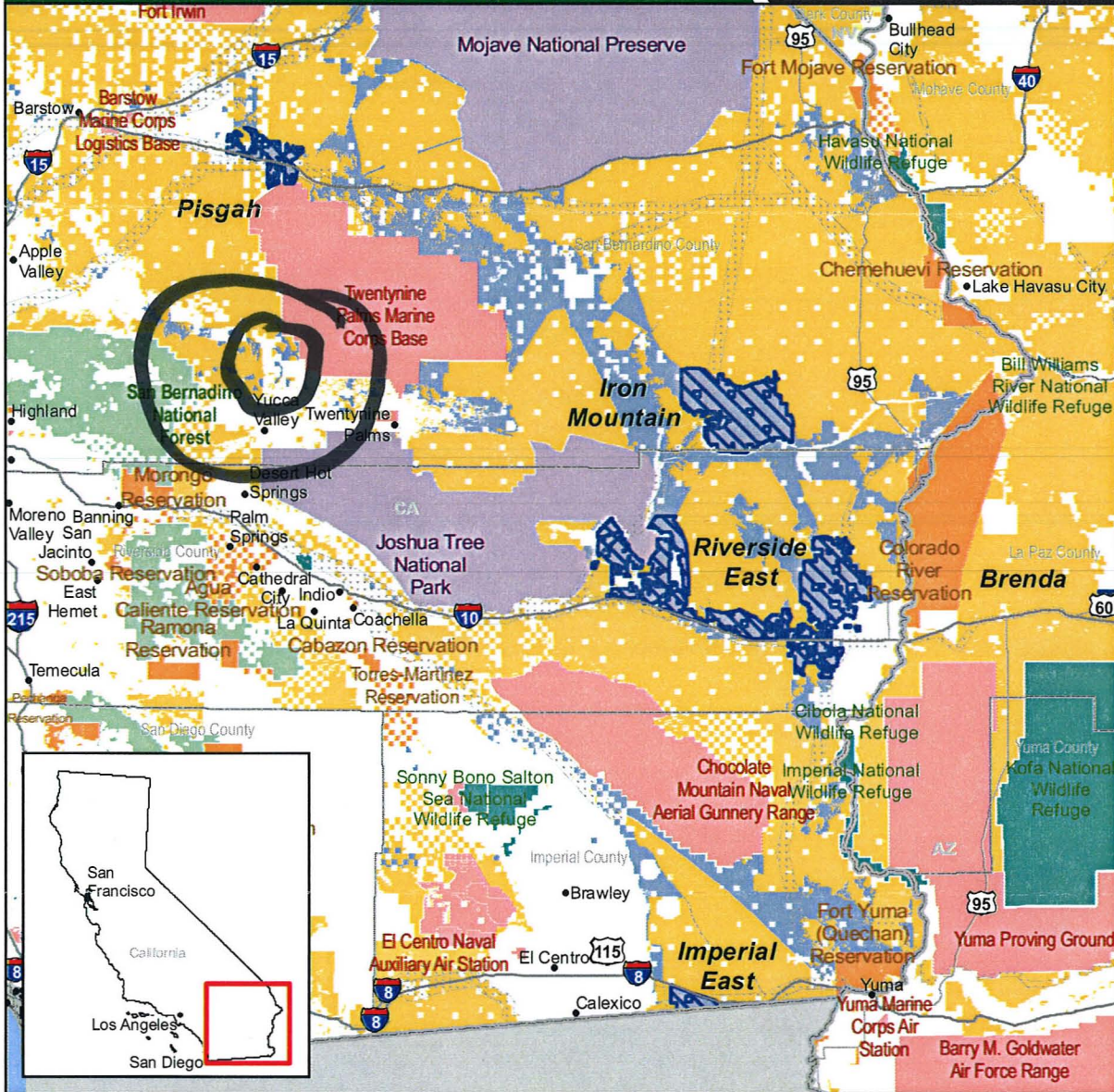
Marina D. West, PG
General Manager

Solar Energy Study Areas in California

Map Prepared July 21, 2009

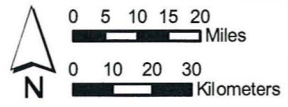


Property of the U.S. Departments of Energy and the Interior for Use in Preparation of their Programmatic Environmental Impact Statement to Develop and Implement Agency-Specific Programs for Solar Energy Development



Surface Management Agency As of 3/26/2009	
Tribal Lands	DOD
BLM	DOE
BOR	FWS
NPS	USFS
OTHER	

- State Line
- County Boundary
- Solar Energy Study Area (As of 6/5/2009)
- Existing Designated Corridor (See Note 2) (As of 7/21/2009)
- 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. SOL139



Areas within Bighorn Desert View Water Agency boundaries - Johnson Valley service areas