

Thank you for your comment, Kenneth Albright.

The comment tracking number that has been assigned to your comment is SolarM60165.

Comment Date: September 8, 2009 10:47:20AM  
Solar Energy Development PEIS  
Comment ID: SolarM60165

First Name: Kenneth  
Middle Initial: A  
Last Name: Albright  
Organization: Southern Nevada Water Authority  
Address: 100 City Parkway, Suite 700  
Address 2:  
Address 3:  
City: Las Vegas  
State: NV  
Zip: 89106  
Country: USA  
Email:  
Privacy Preference: Don't withhold name or address from public record  
Attachment: 9-8-09 SNWA scoping comment letter.pdf

Comment Submitted:

Please see attached comment letter



## SOUTHERN NEVADA WATER AUTHORITY

100 City Parkway, Suite 700 • Las Vegas, NV 89106  
MAILING ADDRESS: P.O. Box 99956 • Las Vegas, NV 89193-9956  
(702) 862-3400 • snwa.com

September 8, 2009

Ms. Linda Resseguie, Project Manager  
Solar Energy PEIS  
Argonne National Laboratory  
9700 S. Cass Avenue - EVS/900  
Argonne, IL 60439

Dear Ms. Resseguie:

**SUBJECT: SOLAR ENERGY DEVELOPMENT PROGRAMMATIC ENVIRONMENTAL  
IMPACT STATEMENT PUBLIC SCOPING COMMENTS**

The Southern Nevada Water Authority (SNWA) appreciates the opportunity to provide scoping comments on the Programmatic Environmental Impact Statement (PEIS) to evaluate solar energy development. SNWA is responsible for management and development of water resources for southern Nevada, and has existing and future interests within the Dry Lake Valley North and Delamar Valley solar energy study areas in Nevada which should be addressed in the PEIS.

SNWA has applied to the Bureau of Land Management (BLM) for rights-of-way to construct the Clark, Lincoln, and White Pine Counties Groundwater Development (GWD) Project, and an Environmental Impact Statement is currently in preparation. The GWD Project consists of pipelines, power lines, and associated facilities for which rights-of-way have currently been requested, and future groundwater production wells, collector pipelines, and distribution power lines for which rights-of-way will be requested in the future. The potential compatibility of solar energy development with groundwater production wells, pipelines, and power lines should be addressed in the PEIS. Specifically:

- The Lincoln County Conservation, Recreation, and Development Act of 2004 designated a utility corridor which extends through the currently identified solar study areas. Under this legislation, the Department of Interior is directed to grant rights-of-way to SNWA for a water conveyance project (the GWD Project).
- The GWD Project pipeline and power line alignments cross the Dry Lake Valley North and Delamar Valley solar energy study areas.
- The Dry Lake Valley North and Delamar Valley study areas also encompass areas which have been identified by SNWA for siting of future groundwater production wells as part of the GWD Project.

#### SNWA MEMBER AGENCIES

Big Bend Water District • Boulder City • Clark County Water Reclamation District • City of Henderson • City of Las Vegas • City of North Las Vegas • Las Vegas Valley Water District

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SNWA has rights-of-way from the BLM for groundwater monitoring and testing wells that are located adjacent to the Dry Lake Valley North and Delamar Valley solar energy study areas. These facilities are part of ongoing regional groundwater monitoring, and are visited at least quarterly to collect data. Access to these facilities uses existing access roads through the solar energy study areas. Any potential solar energy development in these areas would need to allow for continued access to these well facilities.

The PEIS should also address the quantity and source of water that would be required for solar energy development in Nevada. SNWA holds permitted groundwater rights in Delamar and Dry Lake Valleys. The Office of the State Engineer of the State of Nevada Ruling #5875 identified perennial yields, committed consumptive uses, and available quantities of groundwater for future growth and development in those basins.

SNWA holds livestock grazing permits within the Dry Lake Valley North solar energy study area (Wilson Creek grazing allotment). Range improvements may be needed in these areas in the future to maintain and improve ongoing grazing operations. The potential impacts of designation and use of solar energy development areas on grazing allotments, range improvements, and grazing operations should be addressed in the PEIS. This should include potential loss of grazing opportunities, both short term from construction disturbance and the time necessary for restoration in a desert environment, and permanent from the footprint of structures and access roads.

SNWA requests to be added to the mailing list for the PEIS and to receive a CD copy of the document when available. Please send the materials to the attention of Chiaki Brown. We appreciate the opportunity to provide these scoping comments. If you have any questions regarding these comments or need additional information, please contact Lisa Luptowitz, Senior Environmental Planner, at (702) 862-3789.

Sincerely,



Kenneth A. Albright, P.E.  
Director, Groundwater Resources

KAA:LL:df

c: Lisa Luptowitz, Senior Environmental Planner