



Rio Grande Water Conservation District
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Protecting & Conserving San Luis Valley Water

August 18, 2009

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

Re: **Comments on BLM Solar Power Environmental Assessment**

To Whom It May Concern:

The Rio Grande Water Conservation District is organized pursuant to C.R.S. 37-48-101, *et seq.* The conservation and development of the water resources of the Rio Grande and its tributaries is one of the paramount purposes for the District. One specific aspect of your proposal concerning potential solar power opportunities in the San Luis Valley concerns the availability of water resources necessary to permit a solar power initiative to succeed. The District Board of Directors does not have a policy of opposition to solar power. However, we are very aware that some types of solar generation can use significant amounts of water. In fact, we are lead to believe that some solar generation techniques use almost the same amount of water as a coal-fired generation system.

As you know, the State of Colorado is a prior appropriation state. The Federal Government and its agencies have been joined in the State water rights process pursuant to the McCarran Amendment. And, pursuant to that joinder, the Bureau of Land Management has sought and obtained any reserved water rights to which it is entitled. Any water required for solar generation must therefore be acquired pursuant to Colorado law and will be governed by the doctrine of prior appropriation.

The record should be clear that the State of Colorado and its citizens currently fully consume all of the water to which Colorado is entitled under the Rio Grande Compact. Any new depletions, for any