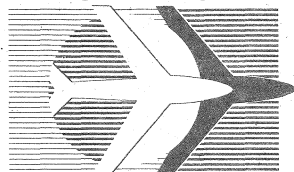


**Department of Aviation****RANDALL H. WALKER**  
DIRECTOR**ROSEMARY A. VASSILIADIS**  
DEPUTY DIRECTORPOSTAL BOX 11005  
LAS VEGAS, NEVADA 89111-1005  
(702) 261-5211  
FAX (702) 597-9553  
E-MAIL: webmaster2@mcarran.com**LAS VEGAS**

McCARRAN INTERNATIONAL AIRPORT

July 8, 2008

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

Dear Staff:

The Clark County Department of Aviation (CCDOA) appreciates the opportunity to submit comments on the scope of the Programmatic Environmental Impact Statement (PEIS) being prepared on solar energy development on Bureau of Land Management (BLM) administered land in six western states.

The development of solar facilities provides an exciting opportunity for alternative energy generation in the western United States. Clark County would appreciate the BLM and the Department of Energy's consideration of several issues of particular importance to CCDOA as they develop the scope of the PEIS.

CCDOA operates a system of airports that serve southern Nevada: McCarran International Airport, Henderson Executive Airport, North Las Vegas Airport, Jean Sport Aviation Center, and Overton-Perkins Field. The CCDOA is also planning a proposed supplemental commercial service airport (Ivanpah) located approximately 25 miles south of Las Vegas and a proposed Southern Nevada Regional Heliport.

As a result of the Ivanpah Valley Public Lands Transfer Act of 2000, Clark County purchased 6,000 acres of public land from the BLM for the purpose of building the proposed Ivanpah Airport. In addition to directing the transfer of the 6,000-acre airport site, Congress also directed BLM to transfer to Clark County an additional 17,000 acres located between Jean and Primm, Nevada. That transfer would take place, at Clark County's option, once the construction of the Ivanpah Airport has been approved in a federal Record of Decision. This area is intended to be used as a noise compatibility buffer area for the proposed new airport. On September 5, 2006, the FAA, as the administrative lead for the FAA and BLM, acting as joint lead agencies, published a Notice of Intent to prepare an EIS on the proposed new airport. The decision regarding construction of the Ivanpah Airport is expected in 2011 or 2012.

CCDOA requests that the PEIS make clear that permit requests for development of solar facilities will not be entertained within the property that is subject to the pending EIS for

**Clark County Board of Commissioners**

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Solar Energy PEIS Scoping  
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the proposed new airport – the 6,000-acre airport site that Clark County already owns and the 17,000-acre noise compatibility area that BLM may transfer to Clark County.

The construction of the proposed new airport would also require the construction of new utility and transportation infrastructure between urbanized Las Vegas and the Ivanpah Airport site. For this reason, Congress directed that a “transportation and utility corridor” be established between Las Vegas and the airport site. BLM has designated that corridor, and the designation will take effect upon federal approval of the new airport. The corridor runs parallel to and immediately east of the right-of-way for Interstate 15 and is one-half mile wide. Utility and transportation infrastructure for the Ivanpah Airport would be constructed somewhere within this ½-mile-wide corridor, but the exact infrastructure location is unknown at this time. Consequently, CCDOA requests that the PEIS designate this property as unavailable for use as a transmission corridor for potential solar facilities until such time as the Ivanpah infrastructure rights-of-way have been identified.

CCDOA also recommends that the PEIS carefully examine the potential for interference between solar generating facilities (and associated transmission lines and facilities) and airport operations at all existing and proposed CCDOA facilities in southern Nevada, including the existing McCarran International Airport and the proposed Ivanpah Airport. That interference could come in the form of height hazards, radar interference, incompatible land uses or glare. Because of the size and number of potential solar facilities, it is important that siting considerations include an analysis of interference with any use of the navigable airspace.

Thank you for the opportunity to comment on the scope of the PEIS.

Sincerely,



RANDALL H. WALKER  
Director of Aviation

RHW:lg

cc: Senator Harry Reid  
Senator John Ensign  
Congressman Jon Porter  
Mary Jo Rugwell  
Virginia Valentine  
Rosemary Vassiliadis  
Teresa Arnold  
Robert Tweedy