

Thank you for your comment, Delaine Shane.

The comment tracking number that has been assigned to your comment is SolarS50620.

Comment Date: July 15, 2008 18:45:14PM
Solar Energy Development PEIS
Comment ID: SolarS50620

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Attachment: MWD Comment Letter - BLM Solar Energy Development NOI PEIS 7-15-08.pdf

Comment Submitted:

Dear Sir or Madam:

Attached in .pdf format are the Metropolitan Water District of Southern California's comments on the Notice of Intent to Prepare a Programmatic Environmental Impact Statement to Evaluate Solar Energy Development, Develop and Implement Agency-Specific Programs, Conduct Public Scoping Meetings, Amend Relevant Agency Land Use Plans, and Provide Notice of Proposed Planning Criteria

I will also be sending a hard copy via U.S. Mail.

Delaine Shane
Manager, Environmental Planning Team
Metropolitan Water District of Southern California [See Attachment.](#)



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

July 15, 2008

Via Electronic & U.S. Mail

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

Dear Sir or Madam:

Notice of Intent to Prepare a
Programmatic Environmental Impact Statement to Evaluate Solar Energy Development,
Develop and Implement Agency-Specific Programs, Conduct Public Scoping Meetings,
Amend Relevant Agency Land Use Plans, and Provide Notice of Proposed Planning Criteria

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the above referenced Notice of Intent to prepare a Programmatic Environmental Impact Statement (PEIS). The proposed PEIS would establish agency-wide solar energy programs and additional related policy. More specifically, the PEIS will evaluate different management strategies to find the best approach for agencies to use when considering approval of proposed solar energy projects on Bureau of Land Management (BLM) managed public land located in the states of Arizona, California, Colorado, New Mexico, and Utah. The Department of Energy (DOE), the U.S. Department of Interior (DOI), and the Bureau of Land Management (BLM) (collectively, Agencies) are the lead agencies for the PEIS. Metropolitan is pleased to submit these comments for the Agencies' consideration in preparing the PEIS.

Metropolitan currently has a significant number of facilities, real estate interests, and fee-owned rights-of-way, easements, and other properties (Facilities) located on or near BLM-managed land in southern California that are part of our supplemental water distribution system. Metropolitan is concerned with potential direct or indirect impacts that may result from the construction and operation of any proposed solar energy project on or near our Facilities. In order to avoid potential impacts, we request that the PEIS include a requirement that all applications for development of solar energy projects on BLM-managed land located on or near Metropolitan Facilities include an assessment of potential impacts to Metropolitan's Facilities with proposed measures to avoid or mitigate significant adverse effects. Metropolitan's specific concerns of potential impacts to Metropolitan Facilities are discussed below.

Background

Metropolitan is a public agency and a regional water wholesaler. It is governed by a 37-member Board of Directors representing 26 member public agencies serving more than 18 million people in six counties in Southern California. One of Metropolitan's major water supplies is the Colorado River via Metropolitan's Colorado River Aqueduct (CRA). The CRA consists of tunnels, open canals, and buried pipelines. CRA-related facilities also include above and below ground reservoirs and aquifers, access and patrol roads, communication facilities, and residential housing sites. The CRA, which can deliver up to 1.2 million acre-feet of water annually, extends 242 miles from the Colorado River, through the Mojave Desert and into the Los Angeles basin. Metropolitan has five pumping plants located along the CRA, which consume approximately 2,400 gigawatt-hours of energy when the CRA is operating at full capacity.

Concurrent with its construction of the CRA in the mid-1930s, Metropolitan constructed 305 miles of 230 kV transmission lines that run from the Mead Substation in Southern Nevada, head south, then branch east to Parker, California, and then west along Metropolitan's CRA. The transmission lines were built for the sole and exclusive purpose of supplying power from the Hoover and Parker power plants on the Colorado River to the five pumping plants along the CRA.

Metropolitan's ownership and operation of the CRA and its 230 kV transmission system is vital to its mission to provide Metropolitan's 5,200 square miles service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. This core function, together with certain proposed solar energy projects near Metropolitan's CRA, its transmission facilities, or both, form the basis for Metropolitan's comments herein.

Land Use Issues: Potential Impacts on Metropolitan Facilities

Metropolitan owns extensive property in fee and easement along the CRA and its related Facilities, including Metropolitan's transmission system. Metropolitan below identifies its specific concerns regarding potential impacts on its Facilities for the Agencies' consideration and incorporation into the PEIS:

1. Metropolitan requests that the PEIS state that neither private nor public entities have any entitlements to build over Metropolitan's Facilities.
2. Metropolitan's Facilities should be considered in planning and in the PEIS, and any projects should avoid potential direct and indirect impacts that may occur due to implementation of the Project.
3. Any new facilities arising out of any projects should not impact accessibility to existing Metropolitan Facilities or impede the use of existing Metropolitan Facilities, including the CRA system.

4. Metropolitan is concerned with potential impacts to its Facilities associated from any future excavation, construction, utilities or any development that may result from implementation of any projects.

5. Development associated with any projects must not restrict any of Metropolitan's day-to-day operations and/or access to its Facilities.

6. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our Facilities at all times in order to repair and maintain our system.

7. In order to avoid potential conflicts with Metropolitan's Facilities, Metropolitan requires that any design plans for any activity in the area of Metropolitan's Facilities be submitted for our review and written approval. Approval of any project where it could impact Metropolitan's property should be contingent on Metropolitan's approval of design plans for that project.

8. All submitted project designs or plans must clearly identify Metropolitan's Facilities.

9. A project shall not rely on Metropolitan's Facilities for mitigation of significant impacts caused by that project.

Land Use Issues: Potential Impacts on Metropolitan's Electrical Transmission System

Metropolitan is concerned that locating solar projects near or across its electrical transmission system could have an adverse impact on Metropolitan's electric transmission-related operations and Facilities. From a reliability and safety aspect, Metropolitan is concerned with development of any proposed projects and supporting transmission systems that would cross or come in close proximity with Metropolitan's transmission system, and accordingly provides the following specific comments on this topic for the Agencies' consideration and incorporation into the PEIS:

1. Metropolitan could be adversely impacted in meeting its water delivery obligations if the development of any projects would: (1) require the de-energization of a portion or all of Metropolitan's electric system; or (2) cause any disruption of Metropolitan's electric system. Any projects should be designed to avoid such impacts.

2. Any project should not plan to interconnect to Metropolitan's transmission system as its transmission capacity is fully subscribed. Moreover, such interconnection could compromise Metropolitan's ability to reliably operate the CRA. Instead, projects should be required to identify how they will interconnect to an alternate transmission line or system.

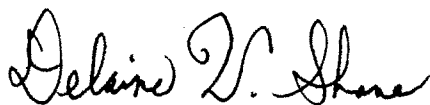
Environmental Issues

Metropolitan also has concerns regarding potential environmental impacts of the solar projects, including impacts to water resources or impacts from the siting of any projects across or in close proximity of its Facilities. Metropolitan provides the following specific comments on potential environmental issues for the Agencies' consideration and incorporation into the PEIS:

1. To the extent the projects require water resources, projects may not rely upon Metropolitan's CRA or other Facilities as a direct source of water, and must identify the source and adequacy of an alternate water supply. The PEIS should address potential impacts to water supplies and resources, including the potential for surface and/or groundwater depletion, and how the projects will mitigate for any such impacts.
2. Any project should not compromise water quality standards or increase the potential of degradation to water quality from chemicals entering subsurface water tables.
3. Any project should not increase the potential of degradation to water quality from new pipelines carrying hazardous material.
4. Hazardous material pipelines, if any, should be placed underground when they cross the CRA.
5. Any change in flow or drainage from new facilities should not cause erosion, subsidence, or damage to Metropolitan's Facilities.
6. Any project must not adversely affect any of Metropolitan's projects, including Hayfield Groundwater Storage and Recharge Project located south of the CRA near the Hinds Pumping Plant.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental and related documentation on this Project. If we can be of further assistance, please contact Raeanne Murphy at (213) 217-6319.

Very truly yours,



Delaine W. Shane

Manager, Environmental Planning Team

RM/rm