



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

December 15, 2010

Tim Coward, Renewable Energy Project Manager  
Bureau of Land Management  
P.O. Box 911  
Tonopah, NV 89049

Subject: Final Environmental Impact Statement, Tonopah Solar Energy, LLC,  
Crescent Dunes Solar Energy Project, Nye County, Nevada  
(CEQ#20100444)

Dear Mr. Coward:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Tonopah Solar Energy, LLC Crescent Dunes Solar Energy Project (Project). Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA provided scoping comments to the BLM in response to the Notice of Intent (NOI) for this Project on December 17, 2009. We reviewed the Draft Environmental Impact Statement (DEIS) and provided comments on October 18, 2010. We rated the EIS as Environmental Concerns – Insufficient Information (EC-2), primarily due to concerns about impacts to water and biological resources, and cumulative impacts associated with the potential development of multiple large-scale energy projects in the region. We also recommended that BLM provide information detailing what impacts climate change may have on the Project.

Thank you for the detailed responses to our comments. These responses provided important additional information concerning the impacts to groundwater resources, stormwater pollution prevention, species mitigation plans, and potential effects from climate change.

EPA remains concerned about the Project's anticipated water demands. Although the proposed hybrid cooling system is preferable to wet cooling, from a water consumption standpoint, this Project is somewhat unique in not relying on dry cooling exclusively. Of the more than twenty solar energy projects within Region 9 that have appeared in the Federal Register recently (as a notice of intent to prepare an Environmental Impact Statement), only four projects continue to propose wet cooling or a hybrid system, as is proposed for this Project. Additionally, during Enrique

Manzanilla's and my meeting with BLM's California and Nevada State Directors on June 30<sup>th</sup> of this year, Ron Wenker indicated he had sent a letter to renewable energy applicants in Nevada to eliminate wet cooling as an option for projects in the Amargosa Valley. EPA supports this guidance and recommended that it apply to all applications on BLM's desert lands. We recommend that BLM work with the Project proponent on a dry cooling option prior to making a final decision.

We are available to discuss all recommendations provided. Please send one hard copy and one CD ROM copy of the ROD to us when it is filed with our Washington D.C. office. If you have any questions, please contact me at (415) 972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at (415) 947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,

/s/

Kathleen M. Goforth, Manager  
Environmental Review Office (CED-2)

cc: Ron Wenker, U.S. Bureau of Land Management  
Ray Brady, U.S. Bureau of Land Management