

US EPA ARCHIVE DOCUMENT



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

January 22, 2013

Liana Reilly, NEPA Document Manager
Western Area Power Administration
PO Box 281213
Lakewood, CO 80228-8213

Subject: Final Environmental Impact Statement for the Quartzsite Solar Energy Project and Proposed Yuma Field Office Resource Management Plan Amendment, La Paz County, Arizona (CEQ# 20120393)

Dear Ms. Reilly:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Quartzsite Solar Energy Project and Proposed Yuma Field Office Resource Management Plan Amendment. Our review and comments are provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement and provided comments to the Western Area Power Administration on February 10, 2012. We rated the DEIS as *Environmental Concerns- Insufficient Information (EC-2)*, primarily due to potential impacts to jurisdictional waters of the United States, direct and indirect impacts to ephemeral washes, site hydrology, and biological resources, as well as cumulative impacts associated with the influx of the multitude of large-scale solar energy projects proposed in the region. Previously, on April 28, 2010, EPA provided extensive formal scoping comments for the proposed project.

We appreciate the efforts of Western Area Power Administration, the applicant, and their consultant to discuss and respond to our primary DEIS comment regarding a jurisdictional determination for waters of the United States. We were also pleased to see the addition of a Nuisance Wildlife Management Plan to address the issue of nuisance wildlife. We note, however, that our recommendations on other matters were not accepted. We remain concerned about the lack of specificity regarding mitigation measures and the lack of consideration of numerous reasonably foreseeable projects in the limited analysis of cumulative impacts. Our detailed comments on the DEIS provided a number of recommendations that, if implemented, could enhance the sustainability of the project and reduce its environmental impacts, including its contribution to cumulative impacts, e.g., by minimizing direct and indirect impacts to desert washes, and minimizing air emissions. We request that those recommendations be reconsidered for incorporation into the Record of Decision, as appropriate.

Please note that, as of October 1, 2012, EPA Headquarters no longer accepts paper copies or CDs of EISs for official filing purposes. Submissions on or after October 1, 2012, must be made through the EPA's new electronic EIS submittal tool: *e-NEPA*. To begin using *e-NEPA*, you

must first register with the EPA's electronic reporting site - https://cdx.epa.gov/epa_home.asp. Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

We appreciate the opportunity to review this FEIS. Should you have any questions regarding our comments, please contact me at (415) 972-3843, or contact Scott Sysum of my staff at 415-972-3742 or sysum.scott@epa.gov.

Sincerely,

/s/

Enrique Manzanilla, Director
Communities and Ecosystem Division