



BOARD OF SUPERVISORS COUNTY OF INYO

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December 6, 2011

Mr. Gregory Helseth
Bureau of Land Management
Southern Nevada District Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130-2301

DOCKET

11-AFC-2

DATE DEC 06 2011

RECD. DEC 12 2011

Re: Notice of Intent to Prepare Environmental Impact Statement for the Proposed Valley Electric Association Hidden Hills Transmission Project, Clark and Nye Counties, NV

Dear Mr. Helseth:

On behalf of the Inyo County Board of Supervisors, thank you for the opportunity to provide input regarding the scope of the Environmental Impact Statement (EIS) for the proposed Valley Electric Association Hidden Hills Transmission Project. We understand that the proposal involves construction and operation of transmission infrastructure, including for electricity and natural gas, on lands administered by the Bureau of Land Management (BLM) in Nevada between Pahrump and the El Dorado Substation near McCullough Pass, in part to support energy generation from a solar thermal power plant planned in Inyo County at Charleston View. This project, proposed by subsidiaries of BrightSource Energy, Inc., involves two approximately 750-foot towers surrounded by 85,000 mirrors each and associated facilities to produce 500 megawatts of electricity. We understand that the proposed gas line is intended to provide service to the power plant.

Not only should the EIS address the impacts of the footprint of the electrical transmission line and gas line, but also, it should address potential cumulative and growth-inducing impacts from the transmission (electricity and natural gas) lines, the power plant in Charleston View, and other known projects (e.g., solar plants proposed in the Amargosa Valley), as well as general growth in the surrounding area.

- Inyo County is particularly concerned about potential hydrological, water supply, and water quality impacts, including effects to the Amargosa River and springs in the region, and the relation between these projects and groundwater overdraft in Pahrump Valley. In 2009, Congress designated 26 miles of the Amargosa River in California a Wild and Scenic River.
 - The bi-state Amargosa River watershed is located within the Death Valley Regional Flow System (DVRFS). The natural resources associated with the river—as well as the area's small local human communities—are entirely dependent on maintaining the groundwater flows that sustain perennial flow in the Amargosa River and its stream, spring, and seep tributaries.
 - The proposed power plant in the Charleston View area would be located in the Pahrump Valley Basin, which is included within, and hydrologically connected to, other basins that comprise the DVRFS. The project proposes to pump groundwater from wells in a basin-fill aquifer. Groundwater pumping for the project, over time, may adversely affect sensitive water-dependent ecological resources in the Wild and Scenic portion of the Amargosa River, including several listed and special status species. As required by Congress, the BLM in California is currently developing a management plan for the Wild and Scenic portion of the river that addresses protection of the free flowing character of the river. There is concern that water use by the proposed power project in the Charleston View area and by other projects in the Amargosa watershed will affect the free flowing characteristics of the river. Consequently, these impacts should be evaluated in the EIS.

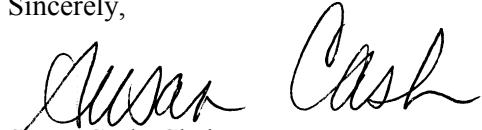
- For the proposed power plant, Inyo County is also very concerned about land use and planning, infrastructure, services, housing, and socioeconomics impacts; the EIS should address these issues due to the relationship between the power plant and the proposed transmission project.
- Due to the lack of private land in Inyo County, potential biological mitigation for the transmission project and the power plant could result in a substantial reduction in private land holdings in the County, which we would consider significant.

For more information regarding these topics, please refer to our County's General Plan and Title 21 (Renewable Energy Development) of the Inyo County Code.¹

Inyo County has a long history of providing renewable energy generation for the nation, and we are proud that our County possesses the resources necessary for future renewable energy production. The Inyo County Board of Supervisors has consistently expressed its support of appropriate renewable energy development, and we hope to continue to collaborate to develop these important infrastructure upgrades necessary to develop renewable energy resources here.

Thank you for including Inyo County in this important planning process. Please contact Kevin Carunchio, the County Administrative Officer, at (760) 878-0292 or by email at kcarunchio@inyocounty.us if you have any questions.

Sincerely,



Susan Cash, Chair
Inyo County Board of Supervisors

cc: Board of Supervisors
Kevin Carunchio, CAO
Randy Keller, County Counsel
Joshua Hart, Planning Director
Bob Harrington, Water Director
Greg James
BrightSource Energy, Inc.
California Energy Commission

¹ Refer to http://inyoplanning.org/general_plan/index.htm regarding the County's General Plan and the Inyo County Code at <http://www.qcode.us/codes/inyocounty/>.