

# Washoe Tribe of Nevada and California

Environmental Protection Department



April 15, 2011

Solar Energy Draft PEIS  
Argonne National Laboratory  
9700 S. Cass Avenue – EVS/240  
Argonne, Illinois 60439

RE: Draft Programmatic Environmental Impact Statement for Solar Energy  
Development in Six Southwestern States – DES 10-59; DOE/EIS-0403

To Whom It May Concern:

In 2010 the Bureau of Land Management (BLM) and the Department of Energy (DOE) prepared the Draft Programmatic Environmental Impact Statement (PEIS) for Solar Energy Development in Six Southwestern States. The Draft PEIS was released to the public on December 17, 2010 and the comment period extended until April 16, 2011. The Washoe Environmental Protection Department (WEPD) understands that the state of Nevada is an important resource for solar energy development and could have large impacts to our neighboring Tribes. WEPD is submitting the following comments/questions regarding the Draft PEIS:

- The Draft PEIS does not treat Tribes as a sovereign nation relative to DOE's allocation of solar energy zones (SEZ) by state per renewable energy portfolio requirements as a driver for allocating solar project demand. The Washoe Tribe has a Strategic energy plan goal of providing all its energy renewably from tribal lands by 20xx, and thus has an energy portfolio standard that is no less than that adopted by the state of Nevada, and is bounded by tribal lands. If a Tribe had an established renewable energy portfolio standard, and Tribes were treated in a manner similar to a state, Tribes could make the argument that DOE should allocate this influence to Tribal lands as a market driver. Additionally, how do the agencies plan on addressing the Tribes' that do not have an established renewable energy portfolio standard, but still have interests in having their energy needs met with renewable energy, and/or from tribal lands?

- Has the BLM completed compiling new visual resources inventory (VRI) data for each of the BLM field offices in Nevada? If not, will these VRIs be completed prior to the Final PEIS? We would like to be able to view this data collection and have the opportunity to comment.
- How will the Tribes be able to view proposed "fast track" project applications or solar energy Right-of-Way applications now that LR2000 is no longer available on line? Many Tribes in Nevada are in remote areas and will have to travel great distances to go to the Reno State Office to view any proposed applications.
- The interests of Tribes in getting priority right of first refusal/and or option(s) to acquire or the right to use adjacent/proximate BLM surplus properties to tribal holdings and/or historic range for energy projects or other uses is not considered in the PEIS. How are the agencies planning on addressing the Tribes' land adjacency/ proximity issues and interests?
- How will the agencies address proposed project areas that are adjacent to areas with important cultural and archaeological resources, such as traditional cultural properties and Native American sacred sites?

Thank you for your consideration in review of this document. We look forward to your response and appreciate your continued efforts with government-to-government consultation. If you have any questions, please call me at 775-265-8691.

Sincerely,

Tara Hess-McGeown  
Environmental Specialist II

THM/ns

## mail\_solareisarchives

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**From:** solareiswebmaster@anl.gov  
**Sent:** Friday, April 15, 2011 8:02 PM  
**To:** mail\_solareisarchives; solareiswebmaster@anl.gov  
**Subject:** Solar Energy Development PEIS Comment SEDD11651  
**Attachments:** BLM\_DOE\_Comment\_Ltr\_DEO\_EIS\_draft\_PEIS\_041511\_SEDD11651.rtf

Thank you for your comment, Tara Hess-McGeown.

The comment tracking number that has been assigned to your comment is SEDD11651. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: April 15, 2011 08:01:20PM CDT

Solar Energy Development PEIS  
Draft Programmatic EIS Comment: SEDD11651

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Comment Submitted:  
please find the attached comment letter

Questions about submitting comments over the Web? Contact us at: [solareiswebmaster@anl.gov](mailto:solareiswebmaster@anl.gov) or call the Solar Energy Development PEIS Webmaster at (630)252-5705.