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

November 28, 2012

Mr. Lane Cowger
RECO Project Manager
BLM Arizona State Office
Attention: Restoration Design Energy Project
One North Central Avenue, Suite 800
Phoenix, Arizona 85004-4427

Subject: Final Environmental Impact Statement for the Restoration Design Energy Project, Arizona (CEQ#20120344)

Dear Mr. Cowger:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA reviewed the Draft Environmental Impact Statement and provided comments to the Bureau of Land Management (BLM) on May 16, 2012. We rated the DEIS as Lack of Objections – Adequate (LO-1). We continue to strongly support the preferred alternative, which we recommended be considered a model for future BLM state and regional planning efforts, and we commend the BLM for the changes made in the FEIS to make a good preferred alternative even better.

Foremost among the changes we are pleased to see are the revisions made to the proposed Agua Caliente Solar Energy Zone (SEZ). Though supportive of the strong design features and best management practices included in the DEIS to protect water resources, we felt there was potential for solar energy projects within the proposed SEZ to affect ephemeral streams. We recommended that the BLM work with the Army Corps of Engineers to identify and avoid all jurisdictional ephemeral waters. We commend the BLM for revising the proposed SEZ boundary so that it is 500 meters away on either side of three washes; and for identifying the proposed SEZ as being within Water Protection Zone 2, which would have the additional design feature requiring industrial water use to be limited to dry cooling technologies.

Please note that, as of October 1, 2012, EPA Headquarters no longer accepts paper copies or CDs of EISs for official filing purposes. Submissions 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. 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.

Sincerely,

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