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

JUN 27 2014

Frank McMenimen
Palm Springs South Coast Field Office
Bureau of Land Management
1201 Bird Center Drive
Palm Springs, California 92262

Subject: Final Environmental Impact Statement for the proposed Modified Blythe Solar Power Project, Riverside County, California (CEQ #20140161)

Dear Mr. McMenimen:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the proposed Modified Blythe Solar Power Project. 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 EIS and provided comments to the Bureau of Land Management on March 24, 2014. We rated the DEIS as *Environmental Concerns– Insufficient Information* (EC-2), primarily due to the project's potential direct and indirect impacts to site hydrology, air quality, biological and cultural resources, and potential cumulative impacts. We recommended that BLM continue to work with US Fish and Wildlife Service to protect sensitive species and identify appropriate lands for habitat compensation.

We appreciate the additional information that was included in the FEIS in response to our comments, particularly the information regarding the clarification of the project fencing, ongoing consultation with US Fish and Wildlife Service regarding biological resources, and the continuing government-to-government tribal consultation with the inclusion of the historic property Programmatic Agreement as Appendix E. We also understand that to ensure their implementation, the proposed design features will be part of the Environmental Construction Compliance Monitoring Program which will be included in the Record of Decision

EPA supports the proposed drainage improvements, and encourages the use of natural features for site drainage as well as limiting vegetation removal. However, we have concerns regarding impacts to non-federal jurisdictional aquatic resources, such as desert dry wash woodlands and vegetated and non-vegetated ephemeral streams. We reiterate our recommendation to avoid these drainages, through design modifications to the photovoltaic array layout, to the greatest extent practicable.

We note that the draft Drainage, Erosion, and Sedimentation Plan has been included as Appendix G. We support the grant holder's intent to minimize disruption of natural flows, lessen erosion and sedimentation, and incorporate best management practices prior to, during, and post construction. In addition, we have the following recommendations for consideration:

- The document states that post-development flow conditions at and downstream of the Modified Project are generally the same to the pre-development conditions, with some increase and decrease in flow due to minor rerouting from changes in interior roughness and access road and fencing (pg. G-14). However, it is unclear how the photovoltaic panel support and mounting structures, especially when installed in the site's washes, were factored into the analysis and whether they will affect flow, and cause an increase in erosion and sedimentation. Therefore, we recommend clarification that the structures were included in the analysis. If not considered, we recommend additional analysis to confirm that the project structures will not adversely affect site and downstream hydrology. Include updated conclusions in the ROD.

- In the ROD, ensure that the final grading does not exceed what was modeled, since the analysis shows that at the peak discharge, the maximum change of discharge outflow will be 7.3%. The document states that this change is considered to be very minor and will not materially impact the drainage conditions within, and down slope of, the Modified Project (pg. G-15).

- The natural wash that crosses the access road will include a wash crossing to protect the access road. The proposed crossing includes the use of cobble or rip rap in combination with a concrete slab (pg. G-13). EPA is concerned that this type of crossing will experience head cutting and erosion and recommends committing to the use of bridging or a bottomless arch culvert, if practicable. Include any updated design measures in the ROD.

- EPA is pleased that the proposed monitoring plan will include inspections prior to a forecasted storm event (and after a rain event) during and post construction for installed BMPs, drainage systems, wash crossings and support structures. However, we recommend that the BLM consider more frequent inspections for the following:

    - Inspect the entire property monthly for adverse erosion conditions and sedimentation for a minimum of one year, and then quarterly thereafter, until the site demonstrates vegetation and hydrologic stability rather than once a year as is currently proposed in the FEIS.

    - Inspect drainage facilities wash crossings and culverts weekly during construction and monthly during the operational phase rather than twice per year as is currently proposed in the FEIS.

We appreciate the opportunity to review this FEIS and are available to discuss our comments and recommendations. If you have any questions, please contact me at (415) 972-3521 or contact Anne Ardillo, the lead reviewer for this project. Anne can be reached at (415) 947-4257 or ardillo.anne@epa.gov.

Sincerely,

Connell Dunning

For Kathleen Martyn Goforth, Manager
Environmental Review Section (ENF-4-2)