



California Energy Commission  
Attention: Clare Laufenberg Gallardo  
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Sacramento, CA 95814

November 19, 2008

**Initial Comments on the Renewable Energy Transmission Initiative (RETI)  
Phase 1B Draft Report, November 2008**

The California Department of Fish and Game (DFG) has reviewed the Renewable Energy Transmission Initiative (RETI) Phase 1B Draft Report and offers the following comments. Please note that the Draft Report in its entirety is a substantial document, and due to the short comment period, DFG has developed initial comments from a limited review of the Executive Summary and the Environmental Working Group's (EWG) *RETI Phase 1B – Environmental Assessment Of Competitive Renewable Energy Zones* sub-report.

DFG supports the efforts of the RETI process to achieve the following environmental goals in identifying competitive renewable energy zones (CREZs) to facilitate the development of renewable energy projects in California:

- disturb the least amount of land per unit of energy output, including land needed to collect and transmit that energy to the existing transmission grid;
- minimize potential conflicts with areas of special environmental concern;
- minimize potential impacts on wildlife and significant species; and
- maximize the use of previously disturbed lands.

The Department of Fish and Game is available and will continue to work with the CEC and the other collaborative stakeholders to ensure the RETI process successfully achieves its goals. DFG's initial specific comments on the draft report follow below.

- **Paragraph 4 of the Preface (Page ES-1).** This paragraph clearly describes the report's limitations as a screening level document that is undergoing continuing review and refinement. The draft report also indicates that a RETI Phase 2 process is planned which will develop conceptual transmission plans and further refine the environmental siting constraints analysis. While the state and federal resource and wildlife agencies participated individually to varying degrees in the RETI Phase 1B EWG process, these agencies need to be more intimately involved in the execution of the Phase 2 environmental analysis to make RETI as

useful as possible for recommending suitable renewable energy development areas.

The agencies, renewable energy industry, utilities, local governments and individual project developers all may need to contribute to some limited regional and site-specific environmental data collection and modeling efforts to provide data for additional analysis, and should do so in a collaborative partnership. There is most likely no new way to further analyze the environmental data used in the Phase 1B analysis and extract more meaningful results.

- **Figure ES-1 (Page ES-8).** The CREZ's in the lower left (LL) quadrant of this figure have the most favorable combined environmental and economic scores. Since the economic analysis of developing a project in a CREZ is tied to the cost of transmission, it is to be expected that these areas would rank favorably, because they already have some level of energy development and are closest to existing transmission. Environmentally, they would also appear to be favorable because some areas within the CREZs are already developed and/or disturbed. Clustering RPS energy development in these areas would reduce the pressure to develop other "new" and relatively undisturbed areas of habitat. While this would tend to reduce the overall potential impacts to wildlife species and habitats, there will still be project-specific impacts at each individual project location that require analysis and mitigation, even in these favorable areas. Also, in clustering the development of such large projects, the potential to encroach upon or cut off critical habitat connectivity and wildlife movement corridors must be carefully analyzed and avoided.
- **Section 4.5 #5 Significant Species (Page 4-3).** This section needs to provide the correct data source citation for CNDDDB, and also provide the citation for the WHR range map data set, consistent with those citations that are provided in Appendix A.

In the report text, it is unclear what wildlife data from DFG was actually used in the ranking analysis. The discussion indicates that CNDDDB data was used, but not the WHR species range map data that was provided. Appendix A, Pg. A-2 cites that both CNDDDB and CWHR range map data sets were used. Please revise the final report to clarify which data sets were used.

The report text does not fully explain how the "number of significant species" was derived from the DFG data sets. Given the complexity of the CNDDDB data set, additional explanation is warranted to inform the readers of the report. DFG would be glad to assist with developing additional explanatory language in consultation with the authors of the report for inclusion into the final version.

- **Section 4.8 #8 Land Degradation (Page 4-5).** In the report text, it is unclear if there is any data that represents as disturbed lands, the oil and gas developments on state, tribal, or private (non-BLM lands). Given that 54% of the

California CREZ areas are identified on non-federal lands, it would be useful to clarify this point, as this category of disturbed land would be underrepresented in the analysis.

Thank you for the opportunity to comment on the draft report. Please contact me at (916) 653-9719, or by email at [sflint@dfg.ca.gov](mailto:sflint@dfg.ca.gov), if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott A. Flint". The signature is stylized and cursive.

Scott A. Flint  
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Environmental Review and Permitting  
California Department of Fish and Game