

TO: clausenb@energy.state.ca.us

PO Box 1756
29 Palms, CA. 92277
Nov 19, 2008

Clare Laufenberg Gallardo
California Energy Commission
1516 Ninth St, MS 46
Sacramento, CA 95814

Dear Ms. Gallardo:

While I have tracked land uses issues within California for quite some time, please note that the comments below are my personal comments and do not represent the views, interests, or positions of any business or organization with which I am currently or formerly affiliated. I also request that my personal address be withheld from public disclosure.

I just became aware of the draft report summarizing the results of Phase 1 of the RETI initiative. Firstly, I do not feel that only 14 days is sufficient time for the public to adequately review the aspects of this important project.

While I appreciate your desire to be proactive and to accelerate development, I also feel that a few open house public meetings are needed to inform, educate and more thoroughly involve the public in the RETI Initiative process. The 3-hour web conference meeting held on 12 November is clearly not adequate to facilitate public engagement and understanding. I encourage you to hold open houses after release of a "preliminary" final report.

I am wondering why you modeled the solar developments using solar trough technology. Was it so that you could screen out developments where slope is greater than 2% or 5%? The final report should succinctly address how planning may change depending on the technology mix ultimately used for solar development (dispatchable vs. non-dispatchable). In other words, please state your assumptions and substantiate your conclusions relative to the use of such technology as parabolic trough, power tower, linear Fresnel, dish/engine, concentrating photovoltaic, and flat-plate photo-voltaic technologies.

Your final report should be clear in its relationship and conformity with the Final Programmatic EIS for wind development. In the same vein, the final report should acknowledge current development of a PEIS for solar development in a 6-state region and should also address how conformity will be achieved. The same holds true for other planning efforts in the region (e.g. Western renewable Energy Zones in a 17-state region, Westwide Energy Corridors EIS).

Regarding your maps, many of them are quite useful. However, they also don't include enough points of references for the lay public to orient themselves. Please include and label major roads, cities and other features. Some maps are unclear when they only include existing powerlines and substations.

I note that of the 37 California CREZs and sub-CREZs identified, only 30 of the most cost effective areas were assessed by the EWG. This was “due to technical reasons which could not be resolved in time for this draft report.” Again, I urge you to take the time necessary to resolve technical issues and do a comprehensive job for the assessment to be presented in the final report.

Eight criteria were used by the EWG for comparing the relative environmental sensitivity of the California CREZs. I found it unfortunate that you did not recognize the importance of designated recreational areas as one of the criteria for consideration. The 189,000-acre designated Johnson Valley open Off-Highway-Vehicle (OHV) area is dear to the hearts of many OHV enthusiasts. In your ranking, did that area’s previous disturbance actually result in it being given a better ranking for potential development? Apparently not, as the Draft Environmental Assessment states that “degraded lands in that category include abandoned mine lands, brownfields, and lands on which oil and gas development had occurred.”

I feel that your E.A. is inadequate by not addressing the potential loss of such land uses as off-highway-vehicle use as alternative energy development sweeps the desert. In fact, all of these issue/resource areas should be further fleshed out in the Environmental Assessment: Aesthetic/Visual resources, Air quality, Biological resources, Cultural resources, Environmental justice, Hazardous materials/wastes, Land use (including effects on private property), Mining/Minerals, Noise, Public health and safety, Public services, Recreation, Socioeconomics, Transportation, Utilities/Infrastructure, and Water resources.

I would encourage you to include various land users such as miners and OHV enthusiasts on your EWG.

On page 35 of the draft report you acknowledge that the Marine Corps Air Ground Combat Center (MCAGCC), Twentynine Palms, CA. has applied to BLM for a proposed military land withdrawal. Subsequent to BLM’s Federal Register Notice published on 15 September 2008, this has resulted in the segregation (for a 2-year period) of about 365,906 acres of public lands and about 507 acres of Federal subsurface mineral estate. You state this only includes land to the east and west of the base. It also includes about 22,000 acres to the south of the existing facility. More info is at the MCAGCC project website: <http://www.29palms.usmc.mil/las/> Thank you for updating this info in your final report and removing the several RETI-identified solar thermal projects within the Marine Corps’ study areas from the resource database.

I found your conclusion that the Green Path North Project (proposed by L.A. Dept. of Water and Power) to be in a CREZ with one of the best combinations of economic and environmental ranking scores. Based on the very vocal and large-scale public opposition to this specific project in the High Desert, I question your methodology and conclusion in this regard. In fact, your Table 3-18 indicates that Green Path North could end up in one of 4 different CREZs (Imperial North, Imperial South, San Diego South, or Baja).

Your draft report utilized an out-of-date BLM database provided to you in May 2008. I look forward to your inclusion of an updated land lease database in your final report.

Your August resource report identified over 3,600 projects with an aggregate capacity of over 500 GW. Subsequently, this Draft report has narrowed that number down to about 2,100 individual projects. I encourage you to use additional economic and environmental screens to focus the analysis even further, as well as to identify (with high, moderate, low criteria) the projects with the most economically developable resources and fewest environmental concerns.

I note that you have excluded wind projects (by giving them a “red” color coding) within “military flyways”. In your final report, I encourage you to do further research and analysis of this potential conflict. You are probably familiar with military Special Use Airspace and that the most prevalent types are Military Operations Areas (MOAs), Military Training Routes (MTRs), and Restricted Areas. In one recent example, the Dept. of Defense Region IX Wind Working Group concluded that the impacts of some proposed wind turbines can be mitigated within a low-level military training route if the turbines are less than 500 feet above ground level as measured to the maximum blade tip height. Such a more comprehensive analysis of military SUA may, in fact, lead to more area identified for potential wind development. In reference to my MCAGCC comment above, your final report should also consider airspace needs concomitant with the proposed Marine Corps land acquisition and airspace establishment project.

I feel that you should reference your source documents for the data shown in Table 3-4 showing “Pre-Identified Military Projects.” I assume that these are developments planned by 2025. You state that “the DoD is beginning to actively lease non-mission critical land on military installations for renewable energy development.” Please note that any surplus energy generated above and beyond military installation needs would have to be properly dealt with. A military installation should be commended for pursuing the economic and security benefit of going “off the grid.” Even in situations where surplus energy is produced (above current and projected base needs), it would be nice if the income generated by putting the excess into the grid could then be turned around and used for installation maintenance, upkeep, etc. Energy development (esp. facilities that would generate to meet current and projected base needs) is appropriate for meeting the defense mission.

In the Draft Environmental Assessment, I question the assumption that “solar projects within 10 miles of populated areas would have access to waste water suitable for cooling. It is assumed that for each 7,000 people, enough recycled water will be available to cool a 100 MW solar thermal plant.” In some case I believe that groundwater will be available for cooling thermal power plants. While a lofty and commendable goal (perhaps acceptable for planning purposes), I don’t believe that treated urban wastewater will be available to that extent.

What are the plans to implement EWG’s recommendation that “consistent statewide scenic quality data be developed so that visual concerns can be included as a rating criterion in future updates of the EWG’s work?” in the final report, please give some indication of the potential of this happening and who should take the lead on the task and when it should be accomplished by.

Same comment for the recommendation that “data on Native American cultural sites be collected and formatted for ready access, and that a methodology be developed for inclusion of potential concerns related to these sites be developed, so that this criterion can be included in future updates of EWG work.”

Prior to publication of the final report, can the SSC affirm the assumptions regarding conversion of certain agricultural lands to energy development that have been utilized to date for future use in the context of RETI?

Please note that these comments are mine alone, and they do not represent the views of any organization, business or association with which I am affiliated.

Please include me on your mailing list for future information and contact as the RETI Initiative project progresses. I can be reached via email to rossjoe@hotmail.com

Thank you very much for considering them.

Sincerely,

Joe Ross