

P.O. Box 1756  
Twentynine Palms, CA 92277  
4 July 2009

Ms. Clare Laufenberg Gallardo  
California Energy Commission.  
1516 Ninth Street  
Sacramento, CA 95814  
Email to [claufenb@energy.state.ca.us](mailto:claufenb@energy.state.ca.us)

Dear Ms. Laufenberg Gallardo,

With regard to the Draft Phase 2A report and maps, 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.

### **GENERAL COMMENTS**

First, I appreciate your extension of the comment period until 10 July. I felt that it was very optimistic to obtain good public review of the draft phase 2A report and maps released in early June by COB on 26 June. I only became aware of that 26 June comment due date by reading the draft report and seeing the date referenced in section 1.4.1 on page 1-20 of the document. Depending on the magnitude and substantive nature of public comments received, I do believe that it will be very ambitious to:

- incorporate comments and distribute the draft final report to the Stakeholder Steering Committee (SSC) by July 17
- post the draft final report incorporating public comments by July 20, and
- have the SSC accept the draft final report with agreed revisions by July 22.

Second, I believe that these key public review milestones and dates should be clearly and prominently announced on the RETI homepage and in the project calendar posted there. While I see the 10 July comment deadline in your “schedule of events” section, such dates should also be listed in the RETI homepage’s calendar feature. Not doing this could easily give the impression that you are not being fully open and transparent in your desire for public review and comment.

Third, I encourage the California Energy Commission to be more proactive in contacting key statewide media outlets (newspaper, radio, television) to build public understanding of the RETI process and announce key dates for public involvement. I hope that you’ll consider issuing regular project updates and news releases to media. With various other similar initiative and projects currently being undertaken, I sense that the public may not be fully aware or understand how they interrelate.

Fourth, I suggest that the California Energy Commission do more community outreach and host public meetings to build public awareness and encourage discussion about the RETI. While I appreciate CEC's desire to keep the process moving and to accelerate development, I also feel that a few strategically located open house public meetings are needed to inform, educate and more thoroughly involve the public in the RETI process. Web conference meetings (such as the one held on 12 November 08) are not adequate to facilitate public engagement and understanding. I encourage you to hold open houses regularly.

Fifth, I appreciate the leadership that California is showing on climate, global warming and alternative renewable energy issues. In 2002, California enacted a Renewable Portfolio Standard requiring 20 percent of the State's electricity to be from renewable sources. In 2006, California's Global Warming Solutions Act ("AB 32") stated that California is required to reduce its global warming emissions to 1990 levels by 2020. This equates to nearly a 30% cut from existing levels. Then in 2008, Governor Schwarzenegger issued Executive Order S-14-08 raising California's Renewable Portfolio Standard to 33 percent by 2020 and calling on the State to reduce its global warming emissions 80 percent below 1990 levels by 2050. All of these components of the State's energy development leadership should be acknowledged in the final RETI Reports.

Sixth, I see little coming from RETI in regards to recommendations for dealing with the bureaucratic red tape, procedures and process predicament that could hinder energy development. Siting, permitting, financing, and constructing projects and transmission is a very complex process that requires substantial coordination among various agencies. Certainly, added financial and human resources will help to expedite permitting. However, I would like to see an all-encompassing coordinated plan for all applicable agencies to efficiently work together to avoid redundancies and cut the red tape without ignoring laws, regulations, and their mandated responsibilities. For example, the BLM should be commended for their identification and NEPA-compliant environmental review of priority development areas within the context of their great programmatic EIS for solar development in a 6-state region.

## **SPECIFIC COMMENTS**

With the RETI Phase 1 completed to identify and rank CREZs, I understand your process to now refine the CREZ analysis of priority zones and develop a conceptual statewide transmission plan. I feel that the Draft Phase 2A Report does an above average job of:

- 1) expanding and refining the analysis of priority CREZs;
- 2) identifying potential issues for generation siting and transmission;
- 3) preparing development resource mix scenarios;
- 4) modeling capacity expansion;
- 5) developing conceptual transmission plans

Section 1.4.3 (page 1-21) implies that a RETI Phase 2B report may be forthcoming later in 2009. I would recommend that you update your April, 2008 mission statement to spell out your intent with regard to a Phase 2B Report:

[http://www.energy.ca.gov/reti/Mission\\_Statement.pdf](http://www.energy.ca.gov/reti/Mission_Statement.pdf)

The report should further expound on how the potential transmission corridors will be considered in the future under the Energy Commission SB1059 designation process.

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). BLM, in cooperation with the Forest Service and DOE, recently completed the Westwide Energy Corridor Programmatic Environmental Impact Statement process, pursuant to the Energy Policy Act of 2005. RETI should acknowledge, ensure consistency and build upon that effort.

Regarding your map, I note that the legend has the “BLM solar lease application” and “BLM wind lease application” color-coded crosshatching reversed what is actually shown on the map.

I hope that all of the 37 California CREZs and sub-CREZs identified have now been fully assessed by the EWG. In the Draft Phase 1 Report, only 30 had been assessed “due to technical reasons which could not be resolved in time for this draft report.” Again, I urge you to take the time necessary during the Phase 2A analysis and reporting to resolve all 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. I’ve been personally told that the 189,000-acre designated Johnson Valley open Off-Highway-Vehicle (OHV) area is very dear to the hearts of many OHV enthusiasts. I see that the Draft Phase 2A Report includes a RETI CREZ Boundary through Johnson Valley, even though no collector line is currently indicated or proposed within this boundary.

In the Final 2A Report, would you please clearly explain why some delineated CREZ boundaries have collector lines shown, and some do not?

I would encourage you to include various land users such as miners and OHV enthusiasts on your SSC, EWG and other committees and subcommittees.

In the Phase 1 report, you acknowledged that the Marine Corps Air Ground Combat Center (MCAGCC), Twentynine Palms, CA. applied to BLM for a proposed military land withdrawal. This 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. In early June, the Marine Corps has since removed about 60,000 acres from further study.

More info is at the MCAGCC project website: <http://www.29palms.usmc.mil/las/> I see no mention of this project underway (or the segregation of public land in place) within the Draft Phase 2A Report. I believe that you should acknowledge this on-going project in your final report, in a similar fashion to how you address and have revised some transmission line segments in recognition of the proposed Mojave Desert National Monument (sections 1.2.5 and 2.5 of the draft report).

A few days ago, the Department of Energy (DOE) and the Bureau of Land Management (BLM) announced the availability of maps depicting solar energy study areas to be analyzed in their joint Programmatic Environmental Impact Statement to Develop and Implement Agency-Specific Programs for Solar Energy Development (Solar PEIS), and the opportunity for additional public scoping.

The solar energy study area maps identify 24 tracts of BLM-administered land selected for in-depth study for solar development. The maps are available on the Solar Energy Development PEIS Web Site at <http://solareis.anl.gov>.

The current public comment period will be open through July 30. During this comment period, the Agencies request comments on solar energy study areas. Comments regarding environmental issues, existing resource data, and industry interest with respect to the proposed study areas in particular are sought.

Within California, BLM/DOE has identified four “Solar Energy Study Areas” where applications will be fast-tracked for large-scale energy development:

Imperial East - 12,830 acres

Iron Mountain – 109,642 acres

Pisgah – 26,282 acres

Riverside East – 202,295 acres

I am attaching the Federal Register Notice that announced these areas and the public scoping period (through 30 July). I am attaching the Federal register Notice that segregated approximately 676,048 of public land in six states. I’m also attaching the map showing the priority solar energy study areas in California.

The RETI Final 2A Report should acknowledge the BLM/DOE project and have a narrative that explains the relationship and consistency between the two planning efforts.

Also, in these four fast-tracked priority areas for solar energy development, you may wish to rethink your assumption stated on page 1-9 of the draft 2A report: “The SSC directed the CPWG to assume that only 40% of the energy output potential of each CREZ

would actually be developed by 2020.” If Secretary of the Interior Salazar’s plan is implemented, you’d likely see a much larger percentage realized on those approximate 351,048 acres in California identified for priority development, broken down as follows:

Riverside County – 202,295 acres

San Bernardino County – 135,924 acres

Imperial County – 12,830 acres

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](mailto:rossjoe@hotmail.com)

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.

Thank you very much for considering them.

Best wishes,

Joe Ross