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CC: <anthony.parisi@navy.mil>, "Hamilton CIV Charles M"
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Date: 7/10/2009 5:20 PM
Subject: Comments on Renewable Energy Transmission Initiative Phase 2A Report

Ms. Clare Laufenberg Gallardo
California Energy Commission.
1516 Ninth Street
Sacramento, CA 95814

Dear Ms. Laufenberg Gallardo,

Thank you for the opportunity to comment on the Renewable Energy Transmission Initiative (RETI) Phase 2A Report.

The Marine Corps, and the military services, are very supportive of the regional planning efforts at addressing alternative energy development in California and the attendant transmission infrastructure and commend the RETI Stakeholder Steering Committee and staff for their extensive and dedicated efforts. We believe the RETI process is an excellent example of large scale collaborative regional planning that is critical to addressing both future energy requirements and balancing environmental protection.

The Marine Corps, as well as the other military services, have enjoyed a significant, historical presence in California and continue to rely on access to land, sea, and airspace to perform our critical mission functions in support of national security. These include operations, training, and research, testing, development, and evaluation (RTD&E). The Department of Defense (DoD) is also the largest economic contributor to California with \$50.8 billion in fiscal year 2008 expenditures. We have been aggressively pursuing the development of alternative energy projects on DoD installations and ranges ranging from design and construction of LEED certified buildings to the installation of solar and wind generating facilities.

We are appreciative of the mention of DoD in Table 2-2. Example of CREZ Environmental Concern Matrix: CREZ 50, page 2-32, and the identification that "Renewable energy facilities, particularly wind and transmission, have the potential to negatively impact military activities. Currently, exclusion based solely upon military constraints is not reasonable. However, specific projects will be reviewed by the military to determine impacts, and could affect development."

There are 4 major comments and concerns that we would offer for

consideration of the Phase 2A Report:

1. Potential impacts to the Marine Corps Air Ground Combat Center, 29 Palms

(MCAGCC 29P): As noted in the proposed maps, proposed alternative energy projects and transmission corridors are noted for development adjacent to the existing and future MCAGCC 29P installation which may impact the Marine Corps' use of the installation. MCAGCC 29P is the Marine Corps' premier live fire, combined arms installation. Personnel and commands deploying to Iraq and Afghanistan are trained there on a daily basis. The installation is in the process of studying land and airspace expansion and at this point has identified 3 major candidate areas for expansion: to the west (Johnson Valley), to the east, and to the south. In cooperation with the Bureau of Land Management (BLM), these areas have been segregated from any further development of any kind pending completion of the National Environmental Policy Act (NEPA) Studies, and the Congressional land withdrawal process. The installation and adjacent area is also crisscrossed by low level ingress and egress fixed and rotary wing training routes and is also home to the endangered desert tortoise. The Marine Corps will work with the RETI process to address any potential impacts from proposed alternative energy development and transmission siting on military missions and land and airspace usage at MCAGCC 29P the earliest opportunity.

2. Impacts to the Marine Corps' Chocolate Mountain Aerial Gunnery Range (CMAGR), Imperial County: As noted in the proposed maps, alternative energy projects and transmission corridors are potentially noted for development adjacent to the CMAGR which may impact the Department of the Navy (DoN) use of the range. The CMAGR, which supports fixed wing, rotary wing, and SEAL training, and includes the delivery of aerial ordnance, is the Marine Corps' premier aviation training range and unique to the Department of Defense. All of the services, and our allies, use the CMAGR. It is the only range in the continental U.S. where the Marine Corps may practice delivery of certain types of ordnance. The range and adjacent area is crisscrossed by low level ingress and egress fixed and rotary wing training routes and is also home to the endangered desert tortoise. The Marine Corps will work with the RETI process to address any potential impacts from proposed alternative energy development and transmission siting on military missions and land and airspace usage at the CMAGR at the earliest opportunity.

3. Potential impacts to low level military airspace and training routes: The Western Region, and associated states, particularly California, is crisscrossed by special use airspace, and low level fixed wing and rotary wing training routes that may extend from the ground surface to an altitude of thousands of feet. While many of the fixed wing military airspace locations are identified in the Federal Aviation Administration's Aviation Publication 1B (AP1B) others, such as low level rotary wing stereo and other training routes are not. As noted, the siting of wind turbines and transmission lines have a demonstrated potential impact on low flying military aircraft and their associated equipment. The military is also studying the potential impact of low level military aircraft on solar mirror arrays. The military will work with the RETI process to address any potential impacts from proposed alternative energy development and transmission siting on low level military airspace and training routes at the earliest opportunity.

4. Potential impacts to species, habitat, and wildlife corridors: On a proportional perspective, DoD lands are home to more rare, threatened, and endangered species than any other federal land management agency. Once, preceding WWII and later, many DoD installations and ranges were sited far away from urban centers, today the reality is that many of our installations and ranges have gradually been surrounded by urban development and to that extent have become islands of biodiversity attracting the last viable vestiges of many species. For example, Marine Corps Base Camp Pendleton has 19 endangered species. In the Mojave and Colorado desert regions, the Marine Corps has several installations and ranges including the Marine Corps Logistics Base Barstow, the Chocolate Mountain Aerial Gunnery Range, Marine Corps Air Ground Combat Center 29 Palms, as does the Army at Ft. Irwin, the Air Force at Edwards Air Force Base, and Navy at the China Lake Naval Weapons Test Center. The services all manage their habitat carefully to protect and promote the endangered desert tortoise. At the Army's Ft. Irwin, and the Marine Corps' Air Ground Combat Center at 29 Palms, the services are raising desert tortoise for release back into the desert to help restore the species. We would ask that careful consideration of the impacts on shared habitat between the military installations and ranges, and that off-military property, be analyzed as alternative energy development sites, and transmission corridors are proposed for siting so that the military does not continue to inherit increasing responsibility for endangered species management at the expense of military missions. To that

extent, the wildlife corridors which connect habitat beyond installations and ranges to habitat on installations and ranges should also be carefully considered in the siting process. Creating isolated pockets of habitat without connection does not adequately promote good environmental stewardship and the viability of a species. The military will work with the RETI process to address any potential impacts from proposed alternative energy development and transmission siting on military missions, land and airspace usage, and environmental stewardship at the earliest opportunity.

Mr. Anthony Parisi (primary), and Mr. Michael Hamilton (alternative), are our military representatives to the RETI process.

Thank you for your attention,

Sincerely,

Patrick L. Christman,