

**Recommendations of RETI EWG
for consideration of the
Stakeholder Steering Committee
Re: Environmental Screen for Phase 1B
Revised 7/1/2008 (per June 26 SSG Meeting Discussion)**

In order to reasonably estimate the renewable development potential of proposed CREZs as a basis for identifying CREZs and related transmission needs, Black & Veatch must recognize areas in which development is precluded, significantly restricted, and assumed available without substantial limitation. The RETI Environmental Working Group (EWG) has identified the first two of these categories of areas.

Black & Veatch should assume that no development will occur in areas where development is effectively precluded, referred to here as Category 1 Lands.

Category 2 Lands are areas in which significant restrictions—but no outright prohibitions—are known to exist. The EWG recommends that Black & Veatch should assume that currently identifiable projects in Category 2 Lands will be developed. For purposes of estimating CREZ resource potential, Black & Veatch should also assume that projects not currently identifiable will not be developed in these areas. That is, Black & Veatch should not place ‘proxy projects’ in these areas. The EWG also recommends that Black & Veatch provide the SSC with estimates of the amount of development potential in each CREZ that might be expected to occur in Category 2 Lands in the absence of restrictions.

The EWG recognizes that the purpose of RETI is to identify to maximum extent possible non-controversial transmission plans. We understand that RETI is not intended to pass judgment on whether or under what circumstances the development of any particular project in any Category 2 area is suitable.

The EWG emphasizes that only the resource development potential of these areas has been considered. The EWG has deferred consideration of potential transmission corridors in these areas, including any appropriate screening factors, to the future.

Category 1 Lands*	
Designated Federal Wilderness Areas	Private Preserves of The Wildlands Conservancy (conservation areas owned and managed by TWC for public benefit and use; development is precluded)
Wilderness Study Areas	BLM National Recreation Areas, BLM National Monuments
CA State Wilderness areas	
Units of National Park System (National Parks, National Monuments, National Recreation Areas, National Historic Sites, National Historic Parks, National Preserves)	Existing Conservation Mitigation banks under conservation easement approved by the state Department of Fish and Game, U.S. Fish and Wildlife Service or Army Corps of Engineers
Inventoried Roadless areas on USFS national forests	CA state defined wetlands**
National Historic and National Scenic Trails	
National Wild, Scenic and Recreational Rivers	
USFWS National Wildlife Refuges	
CA State Parks	

DFG Wildlife Areas and Ecological Reserves	
BLM King Range Conservation Area, Black Rock-High Rock National Conservation Area, and Headwaters Forest Reserve	
Lands precluded by development under HCPs and NCCPs****	

* Some of these lands may allow transmission lines and access roads under certain circumstances.

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Category 2 Lands****	
BLM Areas of Critical Environmental Concern §	
USFWS designated Critical Habitat for federally listed endangered and threatened species	
Special wildlife management areas in the West Mojave Resource Management Plan. Desert Wildlife Management Areas and Mojave Ground Squirrel Conservation Areas.	
Lands purchased by private funds and donated to BLM, specifically the California Desert Acquisition Project by the Wildlands Conservancy	
“Proposed and Potential Conservation Reserves” in HCPs and NCCPs√	
Lands specified as of May 1, 2008 in Proposed Wilderness Bills (S. 493, H.R. 3682) and otherwise not protected ¥	

**** Some Category 2 lands have restrictions unique to each area. Some may prohibit development entirely, while others may permit development under certain conditions, or employing certain technologies. Moreover, in some cases, renewable developers may be able to reach an agreement with land managers of the Category 2 areas that allows development to proceed. However, for the purposes of project identification and CREZ descriptions, development in Category 2 areas should be assumed limited in the absence of site-specific information to the contrary.

§ BLM has informed the Energy Commission that these areas would not be open for wind development and would therefore not be allowed for solar or other development. They told us to move this to category 1; they are depicted on the maps as excluded areas pending further guidance from BLM.

√ We all agree that we need a definition of these terms. Because we do not yet have an agreed-upon definition, we have not mapped these categories.

¥ All wilderness study areas or other lands in Category 1 that are included in the proposed federal wilderness legislation will be treated by Black & Veatch as Category 1 lands.