

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



August 29, 2008

Renewable Energy Transmission Initiative
Stakeholder Steering Committee

RE: Previously Disturbed Lands

Dear Stakeholder Steering Committee Members:

The California Energy Commission staff appreciates your hard work as active members of the Renewable Energy Transmission Initiative (RETI) and would like to take this opportunity to communicate an important renewable energy project siting issue for your consideration. The Energy Commission has over 30 years of experience in siting large power plants throughout the state, and will ultimately permit a large portion of the renewable generation needed to meet the state's 33 percent renewable generation goal. RETI products will be most useful in facilitating the renewable energy permitting process, if they accurately anticipate and reflect key siting issues, including issues associated with the relative benefits of "brownfield" versus "greenfield" development.

Our siting experience indicates that projects on previously disturbed lands, including "brownfield" sites, are generally far superior to "greenfield" sites in terms of reduction of environmental degradation. This will be particularly evident for renewable energy projects that have large site footprints consuming hundreds of acres of land. Renewable energy development should, whenever practical and feasible, target previously disturbed lands. In this regard, we urge you to consider including criteria that reflects the advantages of using previously disturbed lands, and effectively incorporate criteria that will result in prioritizing CREZ and renewable generation projects on previously disturbed lands.

We acknowledge that the database for previously disturbed lands is not complete or consistent throughout the state. However, we request RETI consider using data that is available to the extent it can be verified. In other words, we suggest a "do what you can with what you have" approach. We acknowledge that all previously disturbed lands are not equal and we think that the scoring system you have devised for other environmental criteria can be applied to show different priorities for different types of disturbed lands. We suggest that all previously disturbed land should be prioritized in the CREZ ranking process, with the exception of prime agricultural land.

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Thank you for considering these comments. As always, Energy Commission staff are available to help facilitate this important issue and provide whatever assistance is necessary.

Sincerely,

A handwritten signature in black ink, appearing to read "Terrence O'Brien". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

TERRENCE O'BRIEN
Deputy Director
Energy Facilities Siting Division

TO/jcm