

Thank you for your comment, Joanna Prukop.

The comment tracking number that has been assigned to your comment is SolarS50605.

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Solar Energy Development PEIS
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Attachment: SOLAR SCOPING COMMENTS 07-15-2008 State of New Mexico.pdf

Comment Submitted:

[See Attachment.](#)



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Office of the Secretary

July 15, 2008

Jim Caswell, Director
Bureau of Land Management
c/o Solar Energy PEIS Scoping
Argonne National Laboratory
9700 S. Cass Avenue – EVS/900
Argonne, IL 60439

SUBJECT: Solar Energy Development Programmatic Environmental Impact Statement (Solar PEIS)

Dear Director Caswell:

The New Mexico Energy, Minerals and Natural Resources Department (EMNRD) appreciates this opportunity to assist the Bureau of Land Management (BLM) in moving forward on solar energy development in the western U.S. EMNRD, in concert with the New Mexico Renewable Energy Transmission Authority (RETA), have reviewed BLM's draft scoping process for the Solar PEIS and offer our comments (enclosed). EMNRD and RETA are working hard to deploy new clean energy sources in New Mexico, which is a prime location for siting large-scale solar power plants.

With Governor Richardson's clean energy policies, we have seen significant progress in the development of solar photovoltaics and concentrating solar technology. New Mexico's Renewable Portfolio Standard and Production Tax Credit incentive have attracted solar developers to our high quality solar resource. According to the Solar Energy Industries Association, across all the western states, the number of new photovoltaic projects grew by 48% in 2007 compared to 2006. There are 11 concentrating solar plants operational in the U.S., with another 20 in various stages of planning or permitting. Increasing the production of renewable energy is important for job creation and economic development in New Mexico.

The primary areas for which we provide comments are:

- Expediting projects – BLM should invoke a streamlined permitting process to help accelerate solar development;
- Transmission – new corridors are needed to deliver clean energy to growing load centers;



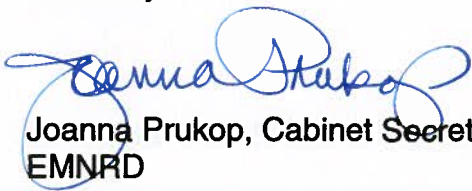
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- Prefer “facilitated development alternative” – an opportunity to prepare for a large volume of solar development;
- Energy security and environmental protection – beneficial to have a more distributed energy network that also reduces the overall impact of energy development.

The BLM’s Solar PEIS is a necessary step in the development of clean energy resources in the western U.S. We ask that the BLM assign the resources needed to work through the Solar PEIS thoroughly and as expeditiously as possible. This is a critical time in clean energy development and we ask that the BLM work together with New Mexico and other western states to achieve our clean energy and economic development goals, and to protect our priceless and beautiful western lands.

Sincerely,



Joanna Prukop, Cabinet Secretary
EMNRD



Lisa Szot, Executive Director
RETA

Enclosure: EMNRD and RETA comments on BLM Solar PEIS Scoping Process

**Comments of the
New Mexico Energy, Minerals and Natural Resources Department
(EMNRD)
and the
New Mexico Renewable Energy Transmission Authority (RETA)
on the
Solar Energy Development
Programmatic Environmental Impact Statement (PEIS) Scoping
Process**

**Joanna Prukop, Cabinet Secretary, EMNRD
Lisa Szot, Executive Director, RETA**

July 15, 2008

We thank you for this opportunity to comment on the proposed Solar PEIS. We support the goals of facilitating the development of solar energy electricity generation. New Mexico has in place some of the most progressive incentives in the nation to encourage solar energy development including: a renewable energy portfolio standard, a renewable energy production tax credit and other tax exemptions.

We urge the Bureau of Land Management (BLM), in developing the PEIS, to emphasize the importance of expediting solar energy development and to strive wherever possible to streamline the approval processes in order to help make project development faster and more economical. While it is important that projects are developed in an environmentally responsible way, it is important to keep in mind that solar energy offers great environmental benefits. The greatest environmental good would come from rapid, large scale deployment. Furthermore, Title II, Section 211, of the Energy Policy Act of 2005 (Pub. L. 109-58) provides that the Secretary of the Interior should, within 10 years of enactment of the Act, "...seek to have approved non-hydropower renewable energy projects located on the public lands with a generation capacity of at least 10,000 megawatts of electricity." In order to meet this very aggressive goal, expedited review processes will be essential.

The western states are affected by human activity occurring in important wildlife corridors, crucial wildlife habitats and other environmentally sensitive areas. In order to protect these areas, it is important for BLM to work with western states to ensure the development of renewable energy zones. Development of these zones should include identification of relevant wildlife corridors and crucial habitat from each western state. Science-based and other information about wildlife corridors, crucial habitat and environmentally sensitive areas should remain a priority. The compilation of this information is important for future inventory work and research, and should be made available and considered at the earliest opportunity in federal planning and decision

making processes. Also, BLM should consider other appropriate policies and actions to avoid, minimize, or mitigate impacts in sensitive areas.

We urge BLM to work closely with utilities, developers, state energy offices and the National Renewable Energy Laboratory in creating a reasonably foreseeable development scenario to define the potential for future utility-scale solar energy development activities over a 20-year study period.

We understand that the PEIS will also consider whether designation of additional electricity transmission corridors on BLM-administered lands is necessary to facilitate utility-scale solar energy development. We believe it is vital that additional transmission corridors are developed in order for the system to have the capability to deliver power from these newly developed resources to growing load centers in the Western Interconnection. RETA has been established to encourage and facilitate the development of new transmission capacity specifically for renewable energy sources of electricity. We urge BLM to work closely with RETA on the designation of additional transmission corridors to ensure that these corridors blend seamlessly into state and regional energy strategies, being carefully coordinated so as to avoid any unnecessary overlap.

In evaluating the three alternatives, we urge BLM to consider that the two alternatives, "no action alternative" and "limited development alternative," are too limited and inadequate to address the challenges of energy security and climate change. Therefore, the environmental consequences of those two alternatives would be relatively detrimental or even catastrophic. We suggest that the preferred alternative should be the "facilitated development alternative." We urge BLM to consider that this is an opportunity to prepare for a large volume of solar energy development that will be critical to the nation's energy security, environmental preservation and economic development.