Thank you for your comment, William Chilson.

The comment tracking number that has been assigned to your comment is SolarS50609.

Comment Date: July 15, 2008 17:59:11PM

Solar Energy Development PEIS Comment ID: SolarS50609

First Name: William Middle Initial: Last Name: Chilson

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Privacy Preference: Don't withhold name or address from public record

Attachment: NextLight.pdf

Comment Submitted:

See Attachment.



July 15, 2008

Solar Energy PEIS Scoping Argonne National Laboratory 9700 S. Cass Avenue – EVS/900 Argonne, IL 60439

Subject: NextLight Renewable Power, LLC Comments on Scope of Solar Energy PEIS

Dear PEIS Scoping Team:

NextLight Renewable Power, LLC is a renewable energy company engaged in the development of utility-scale solar power generation projects in the Western United States. It is our belief that the development of solar resource potential on public lands is an important component of our national policy to secure energy independence and reduce greenhouse gas emissions. We recognize that land management agencies are tasked with balancing the many competing demands on public lands. Solar energy development on public lands will need to be properly integrated into the multiple use management philosophy that is currently in place. Given the need to integrate solar energy development into the management of public lands, we request your consideration of the following points:

- Solar Development Priority Solar energy development should be considered a priority use of
  public lands. While we certainly do not advocate opening environmentally sensitive lands, such
  as DWMAs, ACECs, and WSAs, for solar energy development, we do not believe that other, less
  sensitive public lands should be withdrawn from consideration for solar energy development.
- 2. <u>Designation of Infrastructure Corridors</u> Solar energy development plans will need to include sufficient infrastructure for project viability. This infrastructure includes the need for adequate electric transmission to move power from the solar energy development site to the user market. A sufficient number of designated corridors should be established to allow effective development of solar energy resources. Siting electric transmission routes is often challenging due to the large number of environmentally sensitive areas that can impede development. From a practical standpoint, some infrastructure corridors will need to be able to pass through environmentally sensitive areas.
- 3. Solar Energy PEIS Schedule The need to develop solar energy is such that solar development projects should not be delayed in the event of a protracted PEIS process. We ask that DOE and BLM complete the PEIS on the 22-month schedule as proposed. We also ask that the BLM RMP amendments be prepared during the PEIS completion period, in order to prevent further delay in solar energy project development schedules.

Page 2 July 15, 2008 Solar Energy PEIS Scoping

- 4. Emphasis on Solar Industry Participation As part of the solar energy development industry, we request that industry participation be given emphasis, or priority, in the PEIS development process. It is our experience that the solar development community is very willing to work with the BLM, other agencies, and the public to develop solar energy projects that are viable, while providing environmental protection and being respectful to other important uses of public lands.
- 5. Solar Energy Project Approval Process To be responsive to the national priority for renewable energy development, we request that the procedures for environmental review and approval of solar development projects be well defined, with specific agency review timeframes. Clearly defined requirements and schedules will allow more efficient industry response to the national need for renewable energy development. In addition, where project reviews and approvals require off-site mitigation (including habitat replacement lands) these mitigation requirements should be drawn from existing public land inventory.

Thank you for the opportunity to participate in the Solar Energy Development PEIS process. We look forward to future opportunities for industry participation.

Sincerely,

NextLight Renewable Power, LLC

Brian Kunz

Vice President of Development

BK:dw