Thank you for your comment, Rachel McMahon.

The comment tracking number that has been assigned to your comment is SolarM60227.

Comment Date: September 14, 2009 14:57:57PM
Solar Energy Development PEIS
Comment ID: SolarM60227

First Name: Rachel
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Privacy Preference: Withhold address from public record
Attachment: Solar Millennium comment letter - BLM DOE SESA - 9.14.09.doc

Comment Submitted:

Comment letter attached.

September 14, 2009

SUBMITTED VIA INTERNET FORM

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

Re: Comments of Solar Millennium, LLC on Solar Energy Study Areas and Solar Energy Zones

To whom it may concern:

Solar Millennium, LLC respectfully submits these comments to the Bureau of Land Management (BLM) and Department of Energy (DOE) on proposed Solar Energy Study Areas (SESAs), released to the public on June 29, 2009. Solar Millennium develops solar thermal parabolic trough power plants, and is active worldwide with a focus in Spain, China, North Africa, and the Southwestern United States, with a specific focus in Southern California. Solar Millennium AG developed Europe's first parabolic trough plants – two 50 MW plants in Spain that have achieved operation. A third 50 MW plant is currently in commissioning. Solar Millennium has been an active participant in an associated planning effort, the California Renewable Energy Transmission Initiative (RETI) since it was formed in 2007.

I. Support that SESAs Apply Only to Future Applications

The Federal Register notice and Q&A section of the BLM's solar PEIS website both make clear that the proposed SESAs only apply to future solar applications, and not those currently under consideration, prior to June 30, 2009. This is positive. To judge current solar applications based on newly, and suddenly, proposed SESAs would be counterproductive and to the detriment of achieving the goals set forth in multiple state and federal policies and goals supporting increases in renewable energy and decreases in greenhouse gas emissions. Solar Millennium also stresses that no agency staff resources should be reallocated toward the SESA/SEZ effort and away from the processing of existing solar energy applications.

II. Solar Insolation and Slope Criteria

The SESAs were selected in part by eliminating lands that offer less than 6.5 kWh/m^2/day and greater than 5% slope. These two criteria are not sufficient for solar parabolic trough development. Solar parabolic troughs are best suited for areas with a slope of 2% or less. With regard to solar insolation, in general, each difference of 0.5 kWh/m^2/day between regions means a 10-15% difference in the total output of the solar thermal plant. Higher the solar insolation means greater overall plant output and a smaller overall plant footprint. Thus, from both an environmental and solar generation perspective, it makes sense to focus current and future solar development on lands with the highest solar insolation levels. Solar Millennium encourages the

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BLM and DOE to consider solar resource and slope criteria that are appropriate to different solar technologies.

III. Best Solar Resource in California Not Considered

The proposed SESA map eliminates the area of highest solar insolation in California, the West Mojave Desert. It appears that this would have the effect of eliminating this region from consideration as viable and developable for solar energy resources into the future. It is included in neither the light, nor the dark, blue areas. Many of the lands within the West Mojave Desert cannot be developed because of restrictions under the West Mojave Plan (hereafter "Plan"). The Plan covers more than 9 million acres of the West Mojave Desert in California. More than 3 million of these acres are managed by the Bureau of Land Management. More than 2.5 million of these acres are managed by the Department of Defense.

As the BLM and DOE are aware, the Plan allows development on only 1% of lands within the Plan boundaries. The Plan does not consider solar energy on federal lands, and the BLM has not developed guidance as to how the 1% development threshold should be allocated for solar energy projects. Only a few project developers have active applications for rights of way on lands within the Plan boundaries. The BLM has not yet finalized permitting for these projects. Solar Millennium understands that many renewable energy applications have been rejected by BLM for these lands. Further, the Plan dictates an automatic 5:1 mitigation ratio for developing on some of their lands. This is financially unfeasible for solar development.

Further, military lands within the region contain high quality solar resources within their boundaries – but are also not pursued for development at present because the Department of Defense (DOD) has not yet set forth a proposal for developing solar resources on their lands that is workable for large-scale concentrating solar resource development.

All of these restrictions result in a double-whammy for solar development in this region – it is viewed as being lacking in both environmental preference, and economic interest. The lack of economic interest exists in large part because of both 1) the 1% development restriction under the Plan, and 2) large-scale solar development is not yet feasible on DOD lands. This is a cyclical problem. Interest in developing the solar resource in the West Mojave would be evident it were feasible under existing rules.

Thank you for considering these comments.

Respectfully submitted,

Rachel McMahon
Director, Government Affairs – Project Development

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