

Thank you for your comment, Terrence Shannon.

The comment tracking number that has been assigned to your comment is SolarM60258.

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Solar Energy Development PEIS  
Comment ID: SolarM60258

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Attachment: Cogentrix Comment Letter-BLM NOI-PEIS-SESA.doc

Comment Submitted:



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Solar Energy PEIS  
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Subject: Bureau of Land Management Solar Energy Notice of Intent;  
Comments of Cogentrix Energy, LLC

Dear Bureau of Land Management/Argonne National Laboratory:

On behalf of Cogentrix Solar Services, LLC, I am pleased to submit comments regarding the May 29, 2008 Notice of Intent (NOI) by the Bureau of Land Management (BLM) to prepare a Programmatic Environmental Impact Statement (PEIS) to Evaluate Solar Energy Development on the U.S. Bureau of Land Management's (BLM) Solar Energy Study Areas (SESAs).

Cogentrix appreciates the effort the BLM has expended in establishing the 24 Solar Energy Study Areas (SESAs), and has reviewed the limited amount of detail provided as to how these 24 sites were selected. In comparison to the initial screening criteria Cogentrix employed in evaluating potential solar sites, we have made several important observations. The criteria BLM sited are either equal to or less stringent than those employed in selecting the Cogentrix California projects located on BLM land. In particular, Cogentrix would like to draw your attention to Cogentrix's Baker and Silurian Valley Solar Projects.

Baker is located northwest of Hwy 15 near Baker, California. The disturbed area proposed for the site is roughly 3700 acres, which exceeds the 2000 acre minimum BLM used for selecting SESAs. Cogentrix is proposing to use CPV on the site. This solar technology has less intensive land use as compared to CSP technologies and also has a minimal water requirement by comparison. A Plan of Development (POD) has been submitted and BLM comments were recently received, to which Cogentrix is currently preparing a response. The site is contained in an existing transmission corridor and there are two existing transmission lines in the corridor and abundant room for additional capacity. Cogentrix prepared a report regarding the adequacy of the corridor for the combined use as a solar facility, while maintaining adequate space for future transmission needs. The BLM reviewed the report and has ruled that the project that Cogentrix has proposed and is contained in their POD allows for future transmission expansion. Therefore, they have agreed to proceed with the processing of Cogentrix's ROW application. Also, the California RETI process proposed a high voltage transmission, labeled Mountain Pass, as part of their recent Phase 2A Final Report.

In addition, the Baker site is located next to access roads and is a relatively level site well below the 5% criteria that the BLM employed for selection of the SESAs. The site is not located on any protected or "sensitive" land and has a high insolation making it very attractive for a solar site. The Baker site has the

necessary TUP for siting a solar met station, but one has not been sited since the transmission corridor and the possibility of combined use was yet to be resolved.

Silurian Valley is located 13 miles from Baker on the east side of Hwy 127. The disturbed area proposed for the site is roughly 2500 acres, which exceeds the 2000 acre minimum BLM used for selecting SESAs. Cogentrix is also proposing to use CPV on the site. This solar technology has less intensive land use as compared to CSP technologies and also has a minimal water requirement by comparison. A Plan of Development (POD) has been submitted and BLM comments were recently received, to which Cogentrix is currently preparing a response. In addition, recently completed biological and botanical field surveys found no evidence of desert tortoise or any other threatened or endangered species.

The Silurian Valley site is adjacent to a major LADWP transmission corridor. There are four large transmission lines within the existing corridor. In addition, the site is located next to access roads and is a relatively level site well below the 5% criteria that the BLM employed for selection of the SESAs. Finally, the site is not located on any protected or “sensitive” land and has a high insolation making it very attractive for a solar site. Cogentrix has sited a solar met station on the site and is accumulating critical solar site and design data.

Cogentrix recommends and requests that the BLM add the Baker and Silurian Valley sites as SESAs and eventual SEZs with all the associated benefits going forward. We believe that this is an excellent action and will facilitate the development of solar energy in the exact type of regions that the existing 24 SESAs BLM identified. This is additionally important since they two sites are strategically located outside the “monument area” Senator Diane Feinstein will be proposing later this month.

Please contact us if you have any questions or would like additional information regarding the Baker and Silurian Valley sites or proposed projects. Also, please contact us to discuss the merits of this recommendation for inclusion of these two sites into the SESAs pool.

As a developer of solar resources in a number of western states, Cogentrix is interested in a transparent, open process based on scientific principles. We look forward to working with the BLM on this historic undertaking. Thank you.

Sincerely,

Terrence A. Shannon  
Manager, Environmental Development  
Cogentrix Solar Services, LLC

CC: BLM-S Borchardt, G Miller, J Patrovsky