

## **Environment and Lands Work Group**

### ***Responses to Public Comments - February 2 to March 2, 2009***

Comments received during the public comment period were reviewed during the month of March. All of the comments for this work group can be found on the Web at:

<http://www.westgov.org/wga/initiatives/wrez/comments/comments-e&l-rev.pdf> .

Following is a short summary of the comments received.

Approximately 30 comments were received that were relevant to the efforts of the Environment and Lands work group of the WREZ. The E&L work group's task, in conjunction with the Western Governors' Wildlife Council, is to categorize the development potential of candidate study areas based on environmental, land use, and wildlife criteria. It should be noted that wildlife data was not available for public comment during the February time frame but that an additional short public comment period specifically for wildlife data is scheduled for late April.

The E&L work group met in Portland, Oregon March 11 and 12 and among other items considered each of the E&L-related public comments submitted. The general categories of comments received and E&L's general responses are set forth below.

1) In addition to the environmental exclusions already mapped, a number of commenters pointed out that there are additional sensitive areas that the work group should include and seek to map before finalizing REZ boundaries.

Some of the comments received related to environmental information already collected and considered by the work group or the Wildlife Council while other comments related to wildlife data that is yet to be presented for public comment. The work group is seeking to use west-wide GIS data on environmental sensitivities as well as GIS data available specifically for the Provinces of Alberta and British Columbia, Canada. The state wildlife agencies were responsible for collecting, reviewing and submitting mapped wildlife data. Non-state data that was received was sent to the state agency for considerations. Wildlife data will be available for public comment as part of the REZ review in late April. Publicly available data that will not be incorporated into final REZ maps will be listed in the E&L work group's report as important information sources that should be considered on a project specific or site level basis.

2) A number of commenters suggested that the WREZ process should be attempting to focus renewable energy generation development in already degraded landscapes such as Brownfields and Superfund sites.

The work group appreciates and agrees with these suggestion. However, it is unclear how many of these officially designated sites correspond with potential REZs. It is also unclear how degraded landscapes that are not formally identified can be mapped in this process. The work group has asked the mapping consultant to provide information regarding the data status of

formally designated sites to make a determination regarding their intersection with REZs. The work group agrees that this information is valuable on a project specific level and should be noted for consideration by developers and decision makers. The E&L work group will request that the WREZ Technical Committee allow them to explore the mapping of some degraded landscapes, as they occur within REZs, in Phase 2.

- 3) A number of commenters suggested renewable energy infrastructure should not be placed near urban or residential areas and that the WREZ process should formally buffer these areas in the mapping of the REZs. Commenters also suggested buffering areas that have already been excluded from REZs to account for visual impacts or impacts to wildlife.

The E&L work group appreciates these comments. The Zone Identification and Technical Analysis work group of the WREZ initiative has excluded residential and urban areas from its analysis of areas with the most valuable renewable energy potential. All REZ exclusions have not formally been buffered, but the economic analysis of REZs includes a discount factor of 3% for solar developments and 25% for wind developments such that of the areas identified as REZs, only these percentages of land are probable for development for each resource within the REZ. These discounts would account for necessary buffering of residential areas and wildlife areas. Actual decisions about buffering should be made by project-level decision makers.

- 4) The areas set forth as exclusion or avoidance areas by the E&L work group may allow for development over time or with proper construction techniques and/or off-site mitigation. The WREZ initiative needs to ensure that its final designations clearly note the potential for change and for site specific environmental mitigation.

The E&L work group appreciates these comments and agrees that appropriate caveats need to be included in the WREZ product to indicate the maps represent solely a snapshot in time and need to be used as a tool by appropriate regulatory bodies that have the on-the-ground authority to permit renewable energy generation infrastructure.