

**Western Renewable Energy Zones  
General Comments Received  
February 2 – March 2, 2009**

**Blackfeet Tribal Business Council  
Willie A. Sharp, Chairman**

The Blackfeet Tribe submits these comments regarding the Western Governors' Association (WGA) Western Renewable Energy Zones (WREZ) draft documents and maps. While we support the overall efforts by the WGA to seek extending the power grid into geographically constrained areas in order to reach valuable renewable resources, we ask that tribal sovereign and energy resource interests be given thorough consideration throughout the WREZ multiphase development process.

As a sovereign, the Blackfeet Indian Reservation is made up of 1.5 million acres located in the northwestern part of Montana. We appear to be located within a designated Renewable Energy Zone. The Tribe is well situated and located in an area rich with renewable wind resources. Our tribal government is working carefully to balance our inherent governing responsibilities to our people and our lands with that of our resource development, economic and infrastructure needs. As such, we will carefully choose which lands are appropriate for development. We support your efforts to ensure our renewable energy resources are appropriately identified and ultimately considered in terms of plans for renewable energy integration the power grid. We encourage new transmission to be constructed so that our wind rich area may develop this resource and create important economic development efforts for our people.

Presently, many tribes across the nation are realizing benefits from federal policy support for increased tribal energy development. We would like to see this federal policy encouraging renewable energy development on Indian lands to be reflected in the Western Governor's reports by honoring the wishes of Indian Tribes. If tribal lands are chosen for development by the Indian Tribe, and the area does have a renewable resources, those areas should be included in Renewable Energy Zones. Similar to other sovereigns the ability to govern our lands, resources, and the needs of our people is both inherent and paramount. For these reasons we seek assurance that the Blackfeet Tribe is included in any policy decisions impacting the Renewable Energy Zone located in common with our tribal reservation lands and that our lands are identified as a Renewable Energy Zone.

**Harold One Feather  
self**

As the Great Plains is often called the Saudi Arabia of Wind by leading clean energy advocates, I feel that in the same tone the Native American reservations existing within the Upper Great Plains hold the key to opening the wholesale wind energy production to the eastern urban United States. The main reason why I suggest this as my comment is

that these reservations own large contiguous blocks of land necessary for large scale wind energy development. To leave out this fact will doom wind energy to failure. While there is mention that nuclear energy can provide clean electricity, that is blatant misinformation as the inputs to nuclear energy provide massive quantities of CO2 and other greenhouse gases unlike wind energy. To mine, process and transport uranium to the reactors does nothing but steadily contribute to carbon emissions rather than reducing them. While wind energy has such a relatively small carbon footprint when compared to nuclear energy. As the history of nuclear energy clearly shows, it leaves controversy and is a technological disaster waiting to happen. Wind energy has proven itself to be the one true clean energy, I suggest that you make that happen for our future generations.

**Gaelectric LLC**  
**Kevin Daly**

Gaelectric is an international wind developer operating in the Northwest of the United States. Working in the WREZ region, Gaelectric continually faces the challenge of identifying and supporting transmission solutions for remotely located generation facilities.

Gaelectric wholeheartedly supports the work of the Western Governor's Association and in particular the work of WREZ and it's work in identifying geographically constrained quality resource areas (QRAs) and coordinating potential transmission solutions. One area that might be looked into more closely is the potential for over dependence on the complete accuracy of the NREL maps to determine QRAs leading to the designation of REZs.

**Horizonwind**  
**Logan Winston**

Proactive, long - term, interconnection - wide transmission planning is critical to support the emergence of a new green energy economy. Our location - constrained renewable resources require this sort of coordinated planning effort to develop effective and efficient strategies to deliver green power to the growing markets which demand them to fulfill state and federal Renewable Energy Standards and to address future carbon values. Horizon appreciates the opportunity to comment on the WREZ project.

Horizon believes the WREZ project will be a useful tool for bringing different utilities together to develop regional transmission plans that cross utility and state boundaries to access renewable resources. However, the documents produced by this effort can only provide a snapshot of the various policies, regulations, commodity prices, barriers to development, technologies, etc. that affect renewable energy and that are changing in real time. As such, it is important to highlight WREZ's purpose as a tool for conceptual regional transmission planning, and not for wind energy project planning. Areas identified as suitable, or unsuitable, in the final WREZ report for wind energy development may or may not be appropriate when assessing a particular project area, and the WREZ work products should emphasize that they not be used for decision - making

in relation to individual wind energy projects. Furthermore, it should also be noted that the WREZ process will not identify all viable wind energy projects and that there are high quality, economically developable wind and other renewable energy resources that are located outside of the WREZ areas. For example, there are areas identified as exclusion and avoidance areas that are not necessarily precluded from development but do require more diligence, such as Wildlife Study Areas and Environmental Avoidance Areas.

**Richard Roe  
self**

A second phase of study is recommended to answer the following questions,

What is the timetable for the expansion?

What is the reasonably attainable amount of generation from the various zones?

What are the net costs when all renewable and transmission construction and O&M costs are considered vs. fossil fuel use cost reduction?

What is the net environmental impact considering the environmental impact of constructing, installing and operating all the renewable projects and transmission vs. the impact of continued fossil fuel use?

What alternatives are there to achieve equal environmental benefits, such as retiring inefficient fossil plants and replacing them with highly efficient fossil plants?

What is the optimum portfolio of renewable vs. fossil projects assuming Nuclear is off the table?

**Stephen Schrock  
self**

I didn't have time to read all the draft but that part I did see caused me serious concern. Let me itemize those.

1. Western Colorado is my home as well as the service area for the institution I represent Colorado Northwestern Community College. My remarks are my own however, and not meant to represent those of CNCC.

2. My concerns mainly focused on the establishment of QRAs and how it was decided to include certain alternative energy sectors and exclude others. Why, for instance, was hydro power, bio mass, geo thermal and natural gas apparently excluded from consideration in the QRA development?

3. My concerns also were addressed to the exclusion of the entire geographic area of western Colorado as a QRA. The notion that a major geographic area of Colorado with many traditional and existing alternative energy sources was excluded is mysterious, confusing and bothersome. We have utility scale hydro alternative energy projects currently in operation. We have an abundance of natural gas that both T. Boone Pickens and President Obama agree can be the bridge alternative energy source to the future. We

have great potential for geo thermal and bio mass energy development. Why did this exclusion happen?

4. The outcome of this WGA/WREZ process has the potential for creating geographic areas within states that, in terms of public policy and financing, are either “haves”, or “have not’s”. This determination can have serious implications for future economic development and job creation in areas of the States. How will this document be used to establish public policy and financing?

5. Finally, it is unclear to me what agency or representative of Colorado State government is the lead for Colorado’s involvement in this WGA/WREZ process. How will the final document developed by this process be interpreted and distributed, and by whom, within Colorado?

6. Perhaps all these concerns would have been addressed in a thorough reading of the document but the one I received was an attachment, via email, that originated from another state in the WGA. I didn’t have time to read the full text or attachments. This leads me to my final concern. How was this public review and comment process publicized in Colorado?

**Western Municipal Association**  
**Pat Eklund, Chair**

The Western Municipal Association Board of Directors voted to conceptually support the WREZ Project. In addition, each State Municipal League has been asked to work with its members, and to take a policy position supporting the WREZ Project in concept. So far, the Arizona and Colorado Leagues have formally adopted the attached resolution. Each state has its own policy development process and schedule. We hope to gain unanimous conceptual support within the next two months. Our goal is to help facilitate the active participation of western municipal governments in this critical effort.

We would like to make two key points stated in the attached resolution:

1. In this time of national crisis, the development of alternative energy and adequate new transmission lines is a cornerstone of national policy for creating jobs, stabilizing the economy, creating energy independence, and combating global warming. The WREZ Project is a head start on reaching this goal most effectively and timely.

2. Through our participation in the WREZ Technical Committee, we have observed that the WREZ Project has worked hard to create a balanced partnership of federal, state, local government, the private sector, and other stakeholders, including environmental interests. This openness is critical to achieve a working consensus.

## **Western States Land Commissioner's Association**

### **William F. Warnick**

As an incident of statehood, most western states received grants of federal land to be used primarily for the purpose of funding of public education. Founded in 1949, the Western States Land Commissioner's Association ("WSLCA") was created to help coordinate efforts to effectively manage federal and state trust lands by the respective states' land boards, land commissioners and land offices. Today, the WSLCA is comprised of members from more than twenty states who collectively manage state property rights in more than 440 million acres of surface and submerged lands, including, among other things, mineral right properties and surface waterways.

The WSLCA recognizes the importance developing clean, domestic renewable energy sources in order to reduce the United States' dependence on foreign sources of energy. It strongly supports and encourages the rapid growth of this segment of America's energy portfolio. As managers of large tracts of public trust lands, the members of WSLCA are uniquely positioned to provide access to tracts of suitable land that may be vital to developing large-scale renewable energy projects. Citizens of the western states could receive a double benefit if such projects also produce funding for public education as royalties for renewable energy projects are paid into the state land trusts.

For all its promise, the implementation of renewable energy development is fraught with difficulty. The nation's aging electricity transmission infrastructure has many constraints that severely limit its ability to handle the projected increases in load attributable to electricity from renewable energy sources. Moreover, the natural resources required to produce renewable energy are often located in remote areas, and significant investment in new transmission infrastructure will be required to deliver the generated power to consumers in population centers. Finally, the economics of electrical power generation does not yet sufficiently favor renewables to encourage the capital investment necessary to support its transmission infrastructure needs.

Therefore, the WSLCA strongly supports the current efforts of the Western Renewable Energy Zones Project to modernize the nation's aging power transmission infrastructure. The end result of the Project, if successfully implemented, will be the integration of more low-cost renewable resources with traditional energy resources, an increase in the scope, span, and reliability of grid transmission, and expanding energy choices for utilities and power consumers.

The WSLCA appreciates the efforts that have been made to date by the Western Governors' Association ("WGA") and the United States Department of Energy ("DOE") in implementing the Western Renewable Energy Zones Project. The WGA and DOE's approach of identifying the qualitative potential of all natural resource areas, narrowing the resource areas to Renewable Energy Zones based on the concentration and quality of the renewable energy sources, after considering potential impacts to wildlife and sensitive ecosystems. Providing potential renewable energy developers with a modeling tool to

identify the cost and operational characteristics of each potential Renewable Energy Zone will foster the efficient and cost-effective development of renewable energy sources.

The membership of the WSLCA looks forward to reviewing the siting of the Renewable Energy Zones upon the completion of that phase of the project and promoting renewable energy developer's utilization of the modeling tools once completed to facilitate the development of renewable energy projects on state trust lands.