



California Wind Energy Association

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Dear Paul and Scott,

We are pleased that the Renewable Energy Action Team (REAT) extended the comment deadline for the DRECP guidance documents to November 20th to allow sufficient time for review. There is one issue, however, that we would like to raise sooner rather than later: the need for the REAT to engage the parties in a discussion of the criteria and process to be used to generate any draft maps of suitable development areas well before they are publicly circulated.

According to the BMP draft manual (p. 8), the REAT will identify draft study areas by January 2010. It is our understanding that these will be proposed “no-go” (proposed conservation) areas and “go” areas (where developed projects would fund the conservation areas as mitigation). Areas not in either category would not benefit from any expedited permitting treatment under the DRECP.

CalWEA is concerned that – beyond the general procedural information in the Draft Planning Agreement -- the REAT agencies have not provided any information about how they will go about identifying such areas, and yet a draft will be issued just two months from now. Even a draft map can have long-lasting and far-reaching impacts. CalWEA is especially interested to know how this science-based mapping process will consider environmental impacts specific to each technology relative to the applicable environmental concerns of each area, consistent with existing agency policies.

Given the limited wind resource areas (WRAs) available in the state, and the State Legislature’s desire to encourage reliance on in-state renewables for the RPS, we will want to maximize the

potentially feasible WRAs that are included in the “go” areas (at least for purposes of wind development, even if they are deemed incompatible for solar development).

Therefore, we urge the REAT to first engage the parties in a discussion of the process to be used to generate the map well before any map(s) are issued. We would welcome the opportunity to discuss this with you and the other members of the REAT.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nancy".

Nancy Rader
Executive Director