UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUL 12 2010

OFFICE OF THE
REGIONAL ADMINISTRATOR

Jim Abbott, Acting State Director
Bureau of Land Management
California State Office
2800 Cottage Way, Suite W-1623
Sacramento, CA 95825

Dear Mr. Abbott:

EPA strongly supports expeditiously meeting the nation's energy requirements with environmentally sound and sustainable renewable energy solutions and we are committed to continued coordination between our agencies to work towards achieving this goal.

In the last year, we have coordinated with BLM to assist with the development of a nationwide Programmatic Solar Draft Environmental Impact Statement (DEIS), developing principles that include: appropriate siting near existing energy corridors and on previously disturbed land; use of technologies that minimize water use; and incorporation of designs that maintain natural hydrologic flow and protection of habitat and wildlife movement corridors. At a project level, through our interagency coordination on thirty-four proposed renewable energy projects that are "fast tracked" for American Recovery and Reinvestment Act (ARRA) funding, we have identified recommendations that can help advance renewable energy projects while protecting environmental resources if integrated into environmental review documents and reflected in decision-making. EPA supports the development of an interagency Memorandum of Understanding to continue to advance successful renewable energy development while maintaining functioning ecosystems and a healthy environment.

As addressed in EPA's comment letters on six recent projects (see attached), we have also highlighted measures to facilitate expeditiously processing proposed renewable energy projects while meeting National Environmental Policy Act and Clean Water Act Section 404 requirements, including:

- Analysis of additional alternatives as early as possible in the environmental review process is key to identifying and achieving solutions that minimize adverse environmental impacts, protect ecosystems and human health, and meet energy demand.
- When processing right-of-way applications for specific renewable energy projects, we urge BLM to direct applicants to fully consider alternative size and siting locations on or near BLM lands (already disturbed/contaminated lands, near existing transmission lines, etc.) when such sites would allow for avoidance of impacts to environmental resources. Even though some environmentally preferable sites are not on BLM land, these locations may merit evaluation to help inform the ultimate right-of-way decision. For example, the Garlock Road alternative, an off-site alternative for the Ridgecrest Solar Project (attached), would be located on disturbed private land and would be less impacting than alternatives considered on BLM land.

Thank you for your recent meeting with Enrique Manzanilla and Kathy Goforth, which provided an opportunity to discuss renewable energy projects and environmental challenges in the context of constraints that BLM is facing regarding environmental review and permitting timelines required for eligible ARRA funding and processing of right-of-way applications. We hope to continue to work with BLM and other State and Federal agencies, including the Army Corps of Engineers, in advance of the completion of future environmental reviews, to promote early resolution of potential environmental and permitting challenges. Please don't hesitate to contact me, or Enrique Manzanilla, regarding future coordination on renewable energy projects in California.

Sincerely,

Jared Blumenfeld

Attachments: EPA Comment letters for Six BLM-California Renewable Energy Project DEISs (Palen/Blythe, Genesis, Ridgecrest, Calico, Granite (Wind))

cc: Bob Abbey, Director, Bureau of Land Management
Michael Picker, Office of the Governor
Colonel Mark Toy, U.S. Army Corps of Engineers