Specific comments are as follows:

3.a. **Secure Temporary Use Permit**

During the conference call, the comment was made that there is a difference between the wind energy, solar energy, and geothermal energy developers as to which do testing beforehand and which do not usually do testing. That is a valid comment and needs to be reflected in this section.

1. Under BLM’s wind energy development policy, BLM recognizes three types of right-of-way grants:

**Type I - ROW Grant for Site-Specific Wind Energy Testing and Monitoring Facilities**
- a) A ROW grant is authorized for individual anemometers and/or meteorological towers;
- b) Area authorized is the minimum necessary for construction and operation of temporary facility;
- c) ROW grant precludes applications from other wind energy developers during its term;
- d) Term of grant is three years in length; and
- e) Grant may not be extended or renewed beyond the initial term unless a new application is submitted.

**Type II - ROW Grant for a Wind Energy Site Testing and Monitoring Project Area**
- a) A ROW grant is authorized for anemometers and/or meteorological towers;
- b) Area authorized includes lands proposed for project area;
- c) ROW grant precludes applications from other wind energy developers during its term;
- d) Term of grant is three years in length; and
- e) Grant may not be extended or renewed beyond the initial term unless a new application is submitted.

For both Type I and II ROW grants, the authorization of that grant does not establishes any right to development and a separate ROW application is required for wind energy development (Type III). BLM also retains the right to authorize other compatible uses of the public lands that are included in ROW grants for Type I and II facilities.

**Type III - ROW Grant for Commercial Wind Energy Development Facilities**
- a) A ROW grant is authorized for wind turbines, ancillary facilities, electrical transmission lines, and access roads;
- b) Anticipated term of the ROW grant is expected to be 30-35 years in length;
- c) ROW grant may be assigned subject to approval by BLM Authorized Officer.
- d) ROW grant could be renewed consistent with federal regulations;
- e) BLM retains the right to authorize other compatible uses of the public lands contained in the ROW grant.
2. Under BLM's solar energy development policy, the applicant has the option of submitting an application for either testing or the construction, operation, and maintenance of a commercial solar energy development facility. If the former, their testing activity would be authorized by a lease with a term of three years. If the latter, the applicant would apply for a ROW for a commercial solar energy development facility (e.g., solar collectors, ancillary facilities, electrical transmission lines, and access roads). The anticipated term of the ROW grant would typically be 30 years and could be renewed consistent with federal regulations. Other compatible uses may be authorized, but are unlikely due to the intensive use of the site for PV or CSP facility equipment.

3. Under BLM's geothermal energy development policy, the applicant will usually secure a geothermal lease under the Geothermal Steam Act of 1970, as amended, before any work is proposed on the ground. However, the geothermal entity has the option of proposing exploration activities on the area of interest before nominating the lands for competitive leasing. Once a lease is issued, the lease will run for a term of 10 years, longer if the lessee begins to produce geothermal steam or hot water in commercial quantities during the initial 10 year term. The lease grants to the lessee the exclusive right to drill for, extract, and utilize the geothermal resources, but does not convey exclusive rights to the surface. As such, it is possible that a solar and wind facility could be situated on the geothermal lease, as long as the solar and wind facilities did not interfere with the geothermal facilities.

**BLM's recommendation**
As discussed above, there is a difference between how the developers of wind, solar, and geothermal energy resources utilize testing. Therefore, we concur with the suggestion from one of the participant on the conference call about inserting "as applicable", and have suggested some other changes, so that the language in 3.a. is modified as follows:

A. Secure Temporary Use Permit. Interconnection Customer has obtained a right-of-way or lease that authorizes applicant to place power generation testing facilities on property, as applicable (ROW or lease authorization period is usually 2-3 years) plus

3.b. Undertaking of Significant Additional Activity to Prosecute the Permanent Permit

During the conference call, CA ISO explained that they viewed the criteria of this section as milestones or actions that the applicant needed to have completed, in order to demonstrate that they were committed to developing a renewable energy facility on public lands. CA ISO wanted some documentation from BLM that would recognize that the applicant had met these criteria. A caller, during the conference call, suggested using BLM's Notice of Intent to Prepare an Environmental Impact Statement (NOI) as that documentation. The NOI is published in the Federal Register and begins the formal
scoping process and serves as the official legal notice that BLM, or when BLM is the lead agency, BLM and its cooperators, are commencing an EIS. Since the Federal Register is readily available via the Internet, BLM agrees that a NOI is a good choice for the requested documentation.

We also recommend that CA ISO delete the language contained inside of the brackets [ ], since we believe it to be unnecessary to the intent of the sentence.

3.c. Interconnection Customer is the first in time applicant to satisfy criteria (a) and (b) with respect to the project site.

BLM has no comment as to this section.