Natural Resources Defense Council – Environment California – The Wilderness Society –
Defenders of Wildlife -- The Nature Conservancy – The Pew Charitable Trusts –
Audubon California – Sierra Club – California Wilderness Coalition
Conservation Lands Foundation – California Native Plant Society

The Desert Renewable Energy Conservation Plan Strikes the Right Balance



The Desert Renewable Energy Conservation Plan (DRECP) represents a landmark collaborative effort between the state of California, the federal government, and a diverse group of stakeholders that will balance conservation of the California desert with renewable energy development. This plan provides a roadmap for how California and the federal government will meet ambitious and necessary greenhouse gas emission reduction goals while protecting important public lands. The public land component of the DRECP is likely to be finalized by the end of the summer.

Public lands within the California Desert Conservation Area have long been acknowledged by Congress for their unique and special values

- In 1976, Congress designated the California Desert Conservation Area (CDCA) to promote
 protection of the historical, scenic, archeological, environmental, biological, cultural,
 scientific, educational, recreational, and economic resources of the area. The DRECP
 planning area closely aligns with the boundaries of the CDCA.
- Since 1976, Congress has repeatedly passed laws to conserve the desert's important natural values. In 2009, Congress passed the Omnibus Public Lands Management Act, which instructed the Bureau of Land Management to designate its lands managed for conservation in the CDCA as National Conservation Lands. These National Conservation Lands will be protected for future generations from development but accessible by all to enjoy the wildlife, scenic, and cultural values they host. The DRECP provided the BLM with an opportunity to carry out this congressional mandate while designating areas for renewable energy development.

The DRECP provides a reliable renewable energy roadmap

- The DRECP is eight years in the making, using science, agency collaboration, and extensive input from a diverse group of stakeholders to ramp up renewable energy development while strengthening California's conservation legacy. The proposed plan is the result of dozens of public meetings, assessment of hundreds of datasets, and tens of thousands public comments.
- After years of considerable conflict over the scattershot approach to the development of industrial-scale renewable energy in the California desert, the federal and state agencies decided that to meet ambitious climate change goals and avoid unnecessary conflict, it was imperative to take a landscape level approach to identify "low conflict" areas for renewable energy development. This innovative approach also will help to provide a clearer roadmap for transmission development.
- O Prioritizing development in designated areas will speed up permitting, not slow it down. The DRECP's designation of development areas provides renewable energy developers clear direction as to where to site projects on low-conflict lands, avoiding the past problem of controversy, uncertainty, and conflict that costs developers time and money. This approach has been used successfully in Nevada where the BLM auctioned off parcels of the Dry Lake Solar Energy Zone and was able to permit projects in half the time it had previously.¹
- O In addition to a clear understanding of where projects can be sited, the DRECP provides developers with well-defined instructions on how to site projects and avoid unnecessary impacts, including codifying existing conditions such as the requirement to underground "collector" lines between solar panels while larger gen-tie and transmission lines would continue to be permitted above ground.

The DRECP is unprecedented in the amount of public land it provides for renewable energy development

- The DRECP sets aside more public land for renewable energy development than any other planning effort in BLM history. In fact, the plan provides almost 25% more land than what the BLM previously identified for solar development in total across the six southwestern states.²
- More than 600 square miles (388,000 acres) are identified as Development Focus Areas lands that provide the least conflict with other values of public lands. This represents an area 20% larger than Los Angeles, CA. For reference, if half of this area was developed for

¹ http://wilderness.org/update/solar-project-permitting-time-cut-half-when-inside-solar-energy-zone

² Approved Resource Management Plan Amendments/Record of Decision (ROD) for Solar Energy Development in Six Southwestern States, Table A-2, pg. 41.

solar energy production, it would produce approximately 27,000 MW³, or three times the amount of solar energy produced on all federal lands to date. An additional 62 square miles of "Variance Lands" have been identified as available for possible development and another 837 square miles of "Unallocated Lands" are potentially available for future development if necessary.

The DRECP is a key part of the effort to meet California's and the Federal Government's Ambitious Clean Energy Goals

- O The California Energy Commission (CEC), the state agency charged with ensuring the state meets its Renewable Portfolio Standard of 50% by 2030, has determined that the DRECP provides more than enough lands for development. The CEC used supply- and demand-side assumptions to estimate how much renewable energy—and how many acres of renewable energy development in the DRECP area—might be needed over the coming decades, taking into consideration both California's and the federal government's renewable energy mandates. The public lands component of the DRECP alone provides enough area to support the 20,000 MW target determined by the CEC, despite the fact that more than 60% of renewable energy in the desert to-date occurs on non-federal lands.⁴
- The two main utilities charged with complying with California's 50% RPS mandate strongly support the DRECP. Southern California Edison and Pacific Gas and Electric are under a state mandate to procure 50% of the energy through renewable energy sources. These two utilities have the most to lose if the DRECP does not produce enough renewable energy. In a letter to the federal government, on July 18, 2016, these two utilities wrote to "express [their] strong support for a timely completion of the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment (LUPA)."
- The California desert has a role to play in carbon sequestration another critical strategy to meet emission reduction goals. Recent studies have found that the California desert stores enormous amounts of carbon buried a caliche, or calcium carbonate, in the soil. Disturbance of the fragile desert soil releases a significant amount of carbon into the atmosphere. The California Air Resources Board, charged with implementing California's cap and trade program, had identified conservation of desert lands as a part of the state's effort to sequester or store carbon. Therefore, the DRECP strategy to protect desert lands from further disturbance by directing development into already degraded areas provides an additional benefit of furthering California's emission reduction goals by promoting carbon sequestration.

³ A theoretical scenario using average acres/MW used by the CEC and BLM. See Volume I Chapter 3 of the DRECP Draft Environmental Impact Statement, pg. 3-52.

⁴ Appendix F of the DRECP Final Environmental Impact Statement, pg. F-7

⁵ Allen, M.F., et al (2013). *Carbon Balance in California Deserts: Impacts of widespread Solar Power Generation*. Center for Conservation Biology, University of California, Riverside. http://www.energy.ca.gov/2014publications/CEC-500-2014-063/CEC-50002014063.pdf

Public and private lands, together, are critical to support a renewable energy future

- While public lands in the desert will provide some, but not all of California's renewable energy, private lands play a major role in renewable energy development now and into the future. Private lands are often already degraded (e.g. abandoned agriculture), closer to existing transmission, and closer to urban areas where the energy is needed. Currently, the majority of renewable energy development across California occurs on non-federal lands. California has recognized the role of private lands to meet the state's clean energy goals and has been investing in other planning efforts across the state to identify more private land for development. In a report released earlier this summer as part of a collaborative stakeholder effort led by the California Governor's office, more than 400,000 acres of "low conflict" private lands were identified in California's San Joaquin Valley for renewable development.
- The current Land Use Plan Amendment for public lands under DRECP is only the first phase of identifying areas for potential renewable energy development. In the next phase of the DRECP, federal and state agencies will be working with desert counties to identify degraded and disturbed private lands for renewable energy development and areas for future conservation. Thus far, with funding support from the California Energy Commission, three counties have already identified 326,750 acres for renewable energy development on non-federal lands. The other three counties are currently undergoing planning efforts.

⁶ Of the projects currently in the development phase but not yet operational, only 36% occur on public land. Appendix F of the DRECP Final Environmental Impact Statement, pg. F-7

⁷Inyo County: http://www.inyoplanning.org/projects/documents/Exhibit1CEQAFindings.pdf See Table 1. LA County: http://file.lacounty.gov/bos/supdocs/95462.pdf. Imperial County: http://ftp.co.imperial.ca.us/icpds/eir/cec/final/22Revisions.pdf