RENEWABLES: SMART FROM THE START

Flexibility:

Revised Solar Plan Makes Room

The revised solar plan allows sufficient flexibility to meet the public land's share of regional clean energy needs and support development of a strong American solar industry.

Identifying areas of environmental concern at the outset of the process makes good business sense. By streamlining the process and providing additional project certainty, it clears the way for smart solar power development on public lands. – **Jim Baak, director of utility-scale solar policy at Vote Solar**

Flexibility is a hallmark of the revised solar energy plan

The revised solar plan seeks to strike a balance between the *certainty* that comes from solar energy zones with the *flexibility* to make changes and accommodate the occasional exception. The plan does this through three main elements which, when taken together, present a balanced approach to solar energy development on public lands.

Focusing solar projects in low-conflict areas like the Brenda proposed Solar Energy Zone can lower construction costs and speed environmentally responsible development. Photo Credit: Jon Belak, TWS

First-Generation Solar Energy Zones. The revised plan identifies 17 first-generation solar energy zones, covering 285,000 acres. These lands have been analyzed for their technical suitability for solar development including solar quality and slope; environmental and cultural attributes; water resources; and access to transmission. These are low-conflict BLM lands, prescreened to avoid serious impacts and open to development. Because these zones represent "sweet spots" for solar development, the BLM will set them aside for solar projects by shielding these areas from competing uses. The BLM proposed a number of incentives for developing within zones, including reduced cost of doing business, faster permitting times, focused agency resources, a single point of contact, and environmental review that benefits from previously completed analysis. The BLM is continuing to collect additional specific resource data and conducting additional analysis in order to more effectively facilitate future development in zones.

> *We recognize the importance of making American energy more secure. Future planning for solar must include a balance of meeting our energy goals coupled with the protection of critical wildlife habitat and access to public lands. We applaud the BLM for focusing solar development in suitable zones throughout the West because it will avoid conflict and delay, getting homegrown power online quickly.*
> ***—Tom Mackin, Arizona Wildlife Federation President***

Process to Determine New Zones. The revised plan also lays out methods for designating new zones. A zone reassessment process will assess the need for additional zones based on existing solar market conditions, existing and planned transmission systems, and new state or federal policies affecting the level and location of utility-scale solar energy development. The BLM will evaluate the need for new or expanded zones a minimum of every five years in each of the six states covered by the plan. The assessment of need may take place as part of on-going state-based planning processes or as a separate effort. Developers and other stakeholders may nominate specific areas for review. Current efforts that will result in the identification of new zones are also identified, including processes in Arizona and

California. In addition, the BLM will encourage local land use planning efforts to consider and identify new zones as part of ongoing land use plan revisions. Currently, plan revisions in Nevada and Colorado are doing so.

> ***Commitment to Existing Applications***
> An additional flexibility built into the revised plan is the commitment to processing most existing applications under current policies, not the solar energy plan. This approach ensures the current permit pipeline is not unduly disrupted by the new decision, allowing 79 applications totaling nearly 685,000 acres to proceed with review.

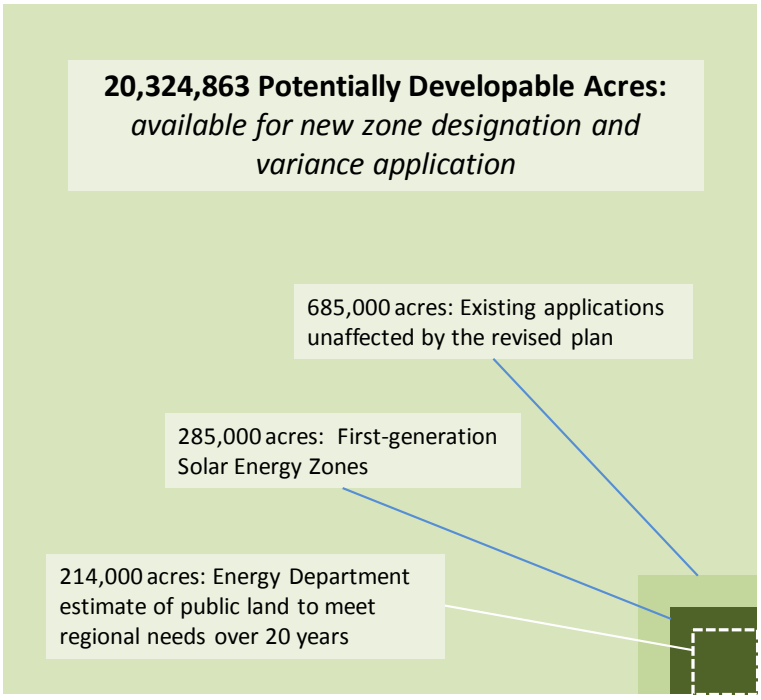
Variance Areas. In response to concerns that zones might not be located in the right places for meeting market demand or maximizing transmission opportunities, the plan also allows for development in variance areas outside of zones through a separate application process. Variance (or "potentially developable") areas represent an additional 20 million acres of BLM lands. Variance applications would be considered on a case-by-case basis on appropriate sites outside of zones subject to an objective set of criteria to ensure that they avoid adverse impacts to wildlands, wildlife, water and cultural resources. In contrast to zones, variance applications would be considered on a case-by-case basis through full environmental review; consultation with appropriate federal, state, and local agencies, and Tribes; and public outreach. The variance process would provide flexibility to industry to propose utility-scale solar projects outside of zones in areas determined to be economically and technically viable, but the burden would rest on industry to make the case for diverting federal resources from processing applications within zones. A successful variance program will process only applications that can demonstrate significant impacts are avoided, and unavoidable impacts are minimized and mitigated.

More than is Needed

Using aggressive assumptions, the Department of Energy (DOE) conducted an analysis of the amount of public land that will be needed to meet state and regional clean energy targets over the next 20 years. Accounting for rooftop solar, wind, and the tremendous opportunities for projects on private lands, DOE concluded the West will need 214,000 acres of public land to produce 24,000 megawatts to satisfy regional demand. While this is only a coarse estimate, it is the best yardstick available to measure the adequacy of the lands available under the federal solar energy plan. Although the first-generation zones alone offer 285,000 acres alone, the revised solar plan means that 20 million acres are potentially developable.

Plenty of Room

Is Land the Constraint for Solar Developers?



There's enough room on our nation's public lands both to produce renewable energy and conserve our natural heritage if we are "smart from the start" in planning our clean energy future.

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