

DRAFT

October 26, 2011

DRECP Preliminary Conservation Strategy

5. PLAN INTEGRATION

This section summarizes previous presentations provided to stakeholders regarding the form of the Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) and provides comparisons between the Renewable Energy Study Areas (RESAs) and Preliminary Conservation Strategy (PCS) map categories, as well as the RESAs and other planning initiatives.

5.1 Plan Structure

Note to Reader: Plan structure concepts were introduced in the DRECP Regulatory Framework Options memorandum dated February 4, 2011, and in the Plan Structure Concepts and Options presentation from the August 17, 2011, Stakeholder Committee meeting. The memorandum and the presentation are posted at www.drecp.org.

At this stage in the process, the regulatory framework for the Desert Renewable Energy Conservation Plan (DRECP or Plan) is a hybrid between the comprehensive NCCP/HCP and umbrella NCCP/HCP. A comprehensive NCCP/HCP is defined as having the broadest coverage for renewable energy development because it has the maximum number of permittees as part of the plan at the time of plan approval. This approach requires the participation of many affected local, state, and federal agencies to prepare the plan and Implementing Agreement.

An umbrella NCCP/HCP could provide the same broad coverage described for the comprehensive NCCP/HCP in terms of species, plan area, and covered activities. However, an umbrella NCCP/HCP has fewer permit holders at plan completion than the comprehensive NCCP/HCP. This approach may allow additional entities to “opt in” after the plan is permitted. Future permit holders may be able to join the plan by applying for permits from the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) under the DRECP, signing an Implementing Agreement agreeing to the terms of the DRECP, and receiving permits from USFWS and CDFG consistent with the DRECP and state and federal permit issuance criteria.

The DRECP is currently structured to provide coverage for all renewable energy development under the jurisdiction of those currently identified as potential permittees—California Energy Commission (CEC), California Public Utilities Commission (CPUC), California State Lands Commission (CSLC), and Bureau of Land Management (BLM). This structure provides substantial coverage but would leave out renewable energy projects on private lands not subject to the jurisdiction of the proposed permittees. For those Covered

DRAFT

October 26, 2011

DRECP Preliminary Conservation Strategy

Activities subject to the permittee jurisdiction, DRECP would be a comprehensive plan. For those Covered Activities not subject to the jurisdiction of one or more of the permittees, DRECP would be an umbrella plan. As more entities join the Plan before its adoption, DRECP would become more comprehensive in its coverage of renewable energy development. The following describes the ways in which this hybrid plan could generally support the goals of the DRECP:

- Three permittees at Plan completion: CEC, CPUC, and CSLC;
- BLM would develop a California Desert Conservation Area (CDCA) amendment and amendments to the three resource management plans, processed concurrently with the DRECP, which implement the DRECP;
- Without becoming permittees, counties and cities could choose to use the DRECP as a reference for a permit-less conservation strategy, guiding local permitting processes during their own local review and permitting of applications for renewable energy development;
- Automatic project review streamlining would become available on BLM and CSLC lands outside of legislatively or legally protected areas; and
- For projects on private lands and not subject to a permittee jurisdiction, project developers could use the DRECP as a streamlined method to obtain state and federal permits for impacts to listed species covered by the DRECP regardless of local jurisdictions' relationship to the plan, by applying for permits directly to USFWS and CDFG and complying with the terms of the DRECP.

5.2 Renewable Energy Study Areas Relative to the Preliminary Conservation Strategy Map

Opportunities for renewable energy development exist to varying degrees across several mapped categories, including Agriculture, Lower Biological Value Areas, Moderate to High Biological Value Areas, and Other Managed and Designated areas. In addition, the DRECP may describe development potential in these areas subject to appropriate criteria. Likewise, these areas are characterized by a variety of biological resource values and the DRECP reserve is likely to be assembled from at least some portions of these areas, consistent with landscape, natural communities, and species-specific biological goals and objectives established for the DRECP.

DRAFT

October 26, 2011

DRECP Preliminary Conservation Strategy

Focusing on areas with lower potential for conflict between renewable energy development and conservation goals, the PCS map depicts five loosely defined RESAs. The RESAs are based upon Renewable Energy Action Team (REAT) criteria, as described in Section 4.3.

Areas in the West Mojave, around Barstow, in east Riverside County near Blythe, Imperial Valley, and parts of the Owens Valley all show potential for renewable development and have a mix of high to moderate and lower value biological resources that require further and more detailed study. The acreages are given by RESA and PCS map category in Table 5.2-1.

Table 5.2-1
Acreages within the Renewable Energy Study Areas by Preliminary Conservation Strategy Map Category

PCS Map Categories	Barstow	Blythe	Imperial Valley	Owens Valley	West Mojave	Total
Agriculture	5,563	63,808	460,005	—	44,277	573,653
Developed Lands	18,550	4,941	29,301	1,482	195,972	250,247
Legally and Legislatively Protected Areas	2,046	1,614	9,670	—	7,295	20,625
Lower Biological Value Areas	44,312	129,844	206,926	24,541	679,994	1,085,617
Military Lands	3,565	—	6,500	—	—	10,065
Moderate to High Biological Value Areas	141,968	113,423	44,426	97,270	733,352	1,130,439
Off-Highway Vehicle (OHV) Lands	—	—	14,251	389	2,260	16,899
Other Managed and Designated Areas	33,378	68,757	148,600	—	14,333	265,068
Salton Sea	—	—	178,213	—	—	178,213
State Vehicle Recreation Area (SVRA) Lands	—	—	4,172	—	—	4,172
Total	249,382	382,388	1,102,064	123,681	1,677,483	3,534,999

5.3 Additional Planning Integration

Additional planning integration provides an evaluation of the RESAs (see Section 4.3) relative to the PCS map (see Section 2.2). Additionally, this section compares the RESAs to the Renewable Energy Transmission Initiative (RETI) Competitive Renewable Energy

DRAFT

October 26, 2011

DRECP Preliminary Conservation Strategy

Zones (CREZs) and the BLM Solar Energy Development Programmatic Environmental Impact Statement (PEIS) solar energy zones.

5.3.1 Comparison of the RESAs to Other Planning Initiatives

To assess the RESAs in relation to potential development, the most applicable proxies are given by comparing the RESAs to other planning initiatives, specifically RETI and the BLM solar PEIS.

Renewable Energy Transmission Initiative

The RETI's primary goal was to identify no regrets and least-cost transmission solutions that maximized access to renewable energy resources across California. To identify transmission requirements, RETI identified and estimated the economic viability of different potential renewable energy areas—CREZs—17 of which are within the Plan Area (CEC 2010).

Direct comparison between CREZs and RESAs show considerable overlap in key areas of the desert (see Table 5.3-1). Of particular importance are areas in the west Mojave and around Barstow as these represent the most economically feasible opportunities. Renewable energy development in RESAs identified in eastern Riverside and the Owens Valley is more constrained and presents lower value opportunities. In contrast, areas recognized as having greater value for development around Kramer lie outside the West Mojave RESA.

**Table 5.3-1
Comparative Overlap of RETI Competitive Renewable Energy Zones and
DRECP Renewable Energy Study Areas**

CREZ Ranking ¹	CREZ - within DRECP Boundary	Megawatt (MW) ²	Equivalent RESA
4	Imperial North-A	1,370	Imperial (partial coverage)
6	Fairmont	2,200	West Mojave
8	Tehachapi	8,626	West Mojave
11	Victorville	1,336	Not in RESA
13	Barstow	1,986	Barstow (partial coverage)
14	San Bernardino - Lucerne	1,845	West Mojave
16	Kramer	4,866	Not in RESA
17	Inyokern	1,896	Not in RESA
18	Mountain Pass	763	Not in RESA
19	Twentynine Palms	1,354	Not in RESA

DRAFT

October 26, 2011

DRECP Preliminary Conservation Strategy

Table 5.3-1
Comparative Overlap of RETI Competitive Renewable Energy Zones and
DRECP Renewable Energy Study Areas

CREZ Ranking ¹	CREZ - within DRECP Boundary	Megawatt (MW) ²	Equivalent RESA
20	Pisgah	1,650	Barstow
23	San Bernardino - Baker	2,513	Not in RESA
25	Imperial East	1,199	Not in RESA
26	Riverside East	7,913	East Riverside
28	Imperial North-B	1,380	Imperial
29	Imperial South	2,823	Imperial
30	Owens Valley	3,750	Owens Valley

¹ Relative economic viability ranking of the CREZ.

² Estimated capacity of CREZ, which gives some indicator of size and ability to contribute to the Renewable Portfolio Standard.

5.3.2 Bureau and Land Management and Department of Energy Solar Energy Development Programmatic Environmental Impact Statement

The BLM and Department of Energy (DOE) jointly lead the national solar PEIS work occurring in six states in the west. The BLM identified 24 solar energy zones in June 2009 and analyzed both the zones and other potentially suitable areas for solar energy development in a draft EIS, released in December 2010 (BLM and DOE 2010). California is home to two of those solar energy zones, totaling approximately 150,000 acres: Imperial East and Riverside East. Originally chosen for analysis in the PEIS because they contained entirely BLM-managed lands and matched the RETI zones closely, the zones also were in areas perceived to be of lower biological conflict. Through the draft EIS analysis and subsequent public comment evaluations, the BLM determined the need to refine the existing zones, develop policies to create new zones, address the adjudication of applications filed both within and outside the zones, and focus on transmission potential into and near the zones (BLM and DOE 2010). In October 2011, the BLM and DOE will release a supplemental draft EIS and subsequently hold public meetings in California, Arizona, and Nevada to explain the changes in the analysis. The BLM and DOE will accept public comment for 90 days after publication of the supplemental draft EIS.

Pending changes to the proposed solar energy zones closely match the RESAs on primarily BLM-managed lands proposed in the DRECP PCS. While the BLM did not add zones in the supplemental draft, the agency refined the boundaries of existing zones to reflect closer analysis of resource conflicts in the zones completed by BLM and DOE specialists, as well as

DRAFT

October 26, 2011

DRECP Preliminary Conservation Strategy

partners in cooperating agencies. With the supplemental draft EIS, the BLM will introduce a process to propose new zones. Additionally, the BLM aims to maintain a close connection with the DRECP to facilitate the adoption of new zones on BLM lands through the DRECP's potential CDCA amendment.

Maps and metrics of the changes to the zones are included in the supplemental draft EIS available at <http://solareis.anl.gov/>.

BLM California initiated a West Chocolate EIS distinct from the national solar PEIS to determine the potential for solar, wind, and geothermal energy development in an area east of the Salton Sea and west of the Chocolate Mountains Gunnery Range. The solar PEIS will continue to remain distinct from the West Chocolate EIS, as the area can host more than simply solar energy development. However, the West Chocolate EIS area presents considerable overlap with the Imperial Valley RESA.