

**DRAFT Recommendations of RETI EWG for consideration of the
Stakeholder Steering Committee
Re: Environmental Screen for Phase 1B**

The Phase 1A analysis by Black and Veatch used an exclusion list produced by NREL, and it is recognized that this high-level screen alone is not adequate for developing realistic CREZs. The Environmental Working Group (EWG) has agreed on a more complete list of protected or environmentally sensitive areas to guide Black & Veatch in the identification of CREZs that accurately reflect renewable development potential in Phase 1B work. In creating a more comprehensive list, the EWG considered the following categories:

- A. Areas where renewable development is currently prohibited by law or policy;**
- B. Areas where renewable development is restricted;**
- C. Areas where development may be possible, but where restrictions are expected to limit potential renewable development substantially.**

The EWG emphasizes that only the resource development potential of these areas has been considered. The EWG has deferred consideration of potential transmission corridors in these areas to the future.

The EWG also recognizes that some lands classified in the Category C above have restrictions unique to each area. Some may prohibit development entirely, while others may permit development under certain conditions, or employing certain technologies. Moreover, in some cases, renewable developers may be able to reach an agreement with land managers of the Category C areas that allows development to proceed. The fact that the EWG has identified these areas as sensitive lands, and having limited development potential should not be interpreted as a prohibition from all development in these areas. Instead, for the purposes of project identification and CREZ creation, the Category C areas should be considered of limited availability for development, absent additional site-specific information to the contrary.

DRAFT Proposal for the Environmental Screen for RETI phase 1B:

1. The CEC will create a GIS map with layers of the excluded lands (table A and B) approved by the Environmental Working Group. Proposed generation projects will not be counted in these lands for purposes of creating CREZs. Black and Veatch will not create any 'proxy' projects in these lands. As stated before, the suitability of electricity transmission on these lands will be discussed by the EWG in the future, prior to Phase 2 conceptual transmission planning. In the interim, the EWG recommends that conceptual transmission across these lands be avoided if a reasonable alternative exists.
2. The CEC will create a GIS map with layers of the lands identified in table C approved by the Environmental Working Group. The EWG recommends that Black and Veatch create two scenarios: Scenario 1 would count only currently proposed generation projects within these lands for purposes of creating CREZs. Under this scenario, Black and Veatch would not create any 'proxy' projects in these lands. Scenario 2 would count both currently proposed generation projects and Black and Veatch 'proxy' projects for the purposes of creating CREZs. These lands will not influence conceptual transmission planning.

EXCLUDED LANDS

Below is a table of lands that we have agreed to exclude from generation projects for the purposes of creating CREZs.

A. Areas where renewable development is currently prohibited by law or policy:*	B. Areas where renewable development is restricted:*
Designated Federal Wilderness Areas	Private Preserves of The Wildlands Conservancy (conservation areas owned and managed by TWC for public benefit and use; development is precluded)
Wilderness Study Areas	BLM National Recreation Areas, BLM National Monuments
CA State Wilderness areas	Lands specified as of May 1, 2008 in Proposed Wilderness Bills (S. 493, H.R. 3682)
Units of National Park System (National Parks, National Monuments, National Recreation Areas, National Historic Sites, National Historic Parks, National Preserves)	Existing Conservation Mitigation banks under conservation easement approved by the state Department of Fish and Game, U.S. Fish and Wildlife Service or Army Corps of Engineers
Inventoried Roadless areas on USFS national forests	CA state defined wetlands
National Historic and National Scenic Trails	
National Wild, Scenic and Recreational Rivers	
USFWS National Wildlife Refuges	
CA State Parks	
DFG Wildlife Areas and Ecological Reserves	
BLM King Range Conservation Area, Black Rock-High Rock National Conservation Area, and Headwaters Forest Reserve	
Lands precluded by development under HCPs and NCCPs	

***We acknowledge that some of these lands may allow transmission lines and access roads under certain circumstances. The EWG will discuss this in the future.**

C. Areas where development may be possible, but where restrictions are expected to limit potential renewable development substantially.

BLM Areas of Critical Environmental Concern
USFWS designated Critical Habitat for federally listed endangered and threatened species
Special wildlife management areas in the West Mojave Resource Management Plan. Desert Wildlife Management Areas and Mojave Ground Squirrel Conservation Areas.
Lands purchased by private funds and donated to BLM, specifically the California Desert Acquisition Project by the Wildlands Conservancy
“Proposed and Potential Conservation Reserves” in HCPs and NCCPs