

## Frequently Asked Questions

### Q. What is the Desert Renewable Energy Conservation Plan?

A. The Desert Renewable Energy Conservation Plan (DRECP) is an innovative landscape-level plan that streamlines renewable energy development, conserves valuable desert ecosystems and provides outdoor recreation opportunities.

The DRECP is a major component of the President's Climate Action Plan and California's renewable energy planning efforts. It will help provide effective protection and conservation of desert ecosystems while allowing for the appropriate development of solar, wind and geothermal energy projects and promoting outdoor recreation opportunities.

The DRECP covers 22.5 million acres in seven California counties - Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino and San Diego, including 10.8 million acres of public lands managed by the Bureau of Land Management (BLM).

The DRECP was developed by the BLM, the U.S. Fish and Wildlife Service, the California Energy Commission and the California Department of Fish and Wildlife, collectively known as the Renewable Energy Action Team (REAT).

### Q. Why is the DRECP important?

A. Since 2009, state and federal agencies have approved dozens of renewable energy projects in the southern California desert. These projects have established California as a lead in utility-scale energy development and has put California on track to achieve its short-term renewable energy goals. However, to date these projects have been permitted through an agency-by-agency, project-by-project approach, which does not always allow for landscape-level considerations about where projects should be located. The DRECP plans at a landscape level in order to identify where future renewable energy projects are best suited, and where they are not. The DRECP provides an opportunity for local, state and federal agencies to consider renewable energy, conservation, wildlife, recreation and the many other values of the desert together in one planning process.



**Q. What does the Phase I of the DRECP include?**

A. As part of the DRECP, the BLM component, or Phase I, amends the California Desert Conservation Area Plan, the Bishop Resource Management Plan and the Bakersfield Resource Management Plan. The BLM plan identifies priority areas for renewable energy development while setting aside areas for conservation and recreation. The plan also identifies National Conservation Lands, and designates Areas of Critical Environmental Concern, wildlife allocations and National Scenic and Historic Trail management corridors to conserve biological, cultural, historical and other values. In recognition of the importance of recreation in the area, the approved plan establishes Special Recreation Management Areas and Extensive Recreation Management Areas in order promote those recreational opportunities and further support public access to these resources. Key allocations on BLM-managed lands include:

- **Development Focus Areas** – 388,000 acres of public lands managed by the BLM are available for solar, wind, and geothermal development. Applications benefit from a streamlined permitting process with predictable survey requirements and simplified mitigation measures.
- **Conservation Designations** – 4.2 million acres of public lands managed by the BLM are designated as National Conservation Lands, Areas of Critical Environmental Concern, wildlife allocations, and National Scenic and Historic Trail management corridors to conserve biological, cultural and other values. These lands are in addition to the 5 million acres of existing conservation in the desert. Lands within these designations are closed to renewable energy, and the BLM will not accept applications in these areas.
- **Recreation Designations** – 3.5 million acres of public lands managed by the BLM are designated as Special Recreation Management Areas and Extensive Recreation Management Areas to recognize a range of recreational values in the desert. Lands within these designations are generally closed to renewable energy development and the BLM will not accept applications in

these areas, except for a small portion of certain Extensive Recreation Management Areas.

- **Variance Lands** – 40,000 acres of public lands managed by the BLM are potentially available for renewable energy development but require an extensive pre-application process to collect additional information before BLM makes a determination on an application.
- **General Public Lands** – 400,000 acres of public lands managed by the BLM are not covered by any of the above designations, although the DRECP creates new management prescriptions for these lands. These lands are potentially available for renewable energy development. Examples of General Public Lands include scattered parcels surrounded by private land, lands underneath the Salton Sea, and lands with existing development such as mines, highways, etc. that haven't seen development demand. These areas were formerly Unallocated Lands.

**Q. How does the BLM plan relate to the overall DRECP?**

A. The BLM plan is the first phase of the DRECP and covers 10.8 million acres of public land managed by the BLM. The decision to use a phased approach was done in part to provide more certainty around renewable development and conservation on public lands while providing more time for planning by the counties and local jurisdiction on private lands.

**Q: Did the BLM consult with the U.S. Fish and Wildlife Service on the DRECP Land Use Plan Amendment?**

A: On August 16, the U.S. Fish and Wildlife Service signed the biological opinion for the proposed Land Use Plan Amendment (LUPA) for the DRECP. In its biological opinion, the FWS concluded that BLM's proposed action is not likely to jeopardize the continued existence of California condor, southwestern willow flycatcher, least Bell's vireo, western yellow-billed cuckoo, Yuma Ridgway's rail or desert tortoise or result in the destruction or adverse modification of critical habitat of the desert tortoise. The FWS also concurred with the BLM's determination that the LUPA is not likely to adversely affect an

additional 19 federally listed species and 14 critical habitat designations that occur in the plan area.

**Q. What changes were made between the release of the Final Environmental Impact Statement in November 2015 and the Record of Decision?**

A. The BLM made minor modifications, clarifications and boundary adjustments to the plan as a result of internal reviews, protests, Areas of Critical Environmental Concern (ACEC) public comments and other public feedback. These include:

- Boundary adjustments, such as the inclusion of Centennial Flat in the National Conservation Lands, additional lands added to the Pisgah ACEC and removal of several developed areas from conservation designations;
- Adjustments to Conservation and Management Actions to clarify intent and minimize inconsistency;
- Terminology changes – the naming of the California Desert National Conservation Lands and the re-naming of unallocated lands to General Public Lands.

**Q. How many protests were received on the Final Environmental Impact Statement? What were the concerns?**

A. The BLM received 43 protests following release of the Final Environmental Impact Statement. Protests raised a variety of concerns, including BLM's compliance with process requirements, mining, recreational access, tribal consultation and mitigation policy.

**Q. What did the BLM do to address protests received on the Final Environmental Impact Statement?**

A. The BLM granted one protest issue related to proper noticing requirements for proposed Areas of Critical Environmental Concern. In order to resolve the protest the BLM published a *Federal Register* notice on March 11, 2016 opening a 60-day public comment period on the ACECs proposed through the

DRECP. The remaining protest issues were resolved without major changes, although minor clarifications were made to the final plan.

**Q. What benefits will the DRECP provide for renewable energy developers?**

A. The BLM's approved plan identifies 388,000 acres of Development Focus Areas (DFAs) designed to streamline renewable energy development, and also identifies more than 400,000 additional acres where renewable energy can be considered. The DFAs were identified because of their energy generation potential and relatively low resource conflicts. The plan has been structured, especially when paired with BLM's forthcoming wind and solar rule, to help steer renewable energy development to these areas by providing a streamlined permitting path and predictable mitigation requirements.

Projects in DFAs, unlike other areas, will experience simplified environmental review because of the data collected and analysis done during the DRECP process. Projects in DFAs will also have consistent and predictable mitigation requirements as reflected in the conservation management actions contained in the approved plan. Developers can also take advantage of cutting edge data collected through the DRECP planning process.

**Q. Does the DRECP restrict renewable energy development?**

A. No. The plan designates 388,000 acres as Development Focus Areas (DFAs), which have been pre-screened for development potential and minimal resources conflicts, and therefore provide opportunities for streamlined development. In addition there are more than 400,000 acres of land outside of the DFAs that could also be considered for renewable energy development, including Variance Process Lands (40,000 acres), General Public Lands (400,000 acres), and a small portion of Extensive Recreation Management Areas (35,000 acres). However, these

lands have not been pre-screened and, therefore, do not provide the same opportunities to streamline development.

This acreage is expected to be more than enough to accommodate the public land portion of the nearly 20,000 megawatts of renewable energy development expected to occur in the desert through 2040, based on the California Energy Commission's analysis. The DFAs alone provide more than enough acreage to support the estimated demand of 8,000 megawatts on public lands through 2040, and have the potential for up to 27,000 MWs if fully built out.

It is accurate that the BLM's plan does make some lands unavailable for such development; however, in each instances those conservation and/or recreation lands were determined to be inappropriate for large scale renewable energy development due to potential conflicts with significant wild-life resources (including avian species), cultural resources, recreation areas, military operations and other uses. To date, wind energy development in southern California has primarily occurred in the San Gorgonio Pass and Tehachapi areas, neither of which is affected by the proposed BLM plan.

**Q. How did the agencies come up with the 20,000 megawatt planning assumption?**

A. Energy planning assumptions developed for the DRECP used California's climate goal of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050 as the starting point. The Energy Commission developed and released a DRECP acreage calculator that uses supply and demand 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. The calculator was used to develop three sets of acreage scenarios, the first of which estimated the 2050 need for renewable energy and the related acreage to accommodate it. Based on stakeholder feedback and the uncertainty of planning for 2050, the Energy Commission scaled

back the time horizon to 2040 and estimated that 20,000 megawatt of renewable energy would be needed.

**Q. How were rooftop solar and energy efficiency addressed in the planning assumptions?**

A. The scenario developed to establish the 20,000 megawatt assumption assumed that 16,000 megawatts of distributed generation, which includes rooftop solar, would be installed by 2040. If more is installed and no other assumption in the scenario changes, less large-scale renewable energy development will be needed by 2040.

The scenario also considers the impact of energy efficiency measures and programs on electricity demand, which are embedded in the California Energy Demand 2014–2024 forecast. This forecast formed the basis for the electricity demand assumed for 2040. Given the state's commitment to reducing energy use and using energy efficiency as a primary way to reduce greenhouse gas emissions, it is assumed that expenditures on energy efficiency and resulting savings would remain high during the 2014–2040 period.

**Q. Will the DRECP approve new development?**

A. No. The DRECP does not approve any individual renewable energy development projects. Individual renewable energy projects will continue to follow existing laws and regulations, and need to be approved by applicable local, state or federal agencies, such as county governments, the California Energy Commission and the BLM. The DRECP identifies areas where such development can occur and establishes avoidance, minimization and compensation measures and other environmental requirements for these projects on public lands in order to protect wildlife, ecosystems, cultural resources, recreation and other values.

**Q. By advancing the BLM component of the plan first, will more development be driven to public lands?**

A. No. The DRECP continues to assume that there will be demand for about 20,000 megawatts of renewable energy in the California desert through 2040, and that this demand will be spread between public and private land (consistent with development patterns to date). The amount of land proposed as Development Focus Areas on public lands has not significantly increased between the Draft DRECP, Final EIS and Record of Decision. Demand estimates are a planning assumption only and not a goal, requirement or forecast for renewable energy development in the desert.

**Q. How will the DRECP affect the public's ability to access and use public lands in the desert?**

A. The BLM plan includes several land use designations on public lands including Development Focus Areas which will be available for utility scale renewable energy, conservation designations (e.g. National Conservation Lands and Areas of Critical Environmental Concern) where renewable energy will not be permitted, and Special Recreation Management Areas that will be managed as high priority recreation areas where renewable energy will generally not be permitted. The BLM's plan ensures that appropriate access, recreation and other activities on these undeveloped public lands will not be impeded by renewable energy development.

**Q. How will the DRECP affect the public's ability to access and recreate on BLM-managed lands in the desert?**

A. The DRECP will protect recreation and other uses of public lands in the desert. New conservation lands will be off-limits to renewable energy development, ensuring that the natural, cultural, scenic and compatible recreational resources in those areas are protected. The plan will ensure that those who enjoy these lands can continue to do so. The plan will not

close any designated routes or open off-highway vehicle areas.

**Q: Does the DRECP withdraw conservation lands from mining?**

A: The BLM plan does not withdraw any lands from mineral entry. It does describe how the BLM would consider future withdrawals. Any future withdrawals would go through a full public process and would not affect valid, pre-existing mining claims or other authorized uses. The BLM will initiate a withdrawal process within 60–90 days of the Record of Decision.

**Q. What are general public lands (formerly unallocated lands) in the DRECP and are they open for renewable energy?**

A. General public lands, formerly referred to as unallocated lands in the Draft and Final EIS, are public lands managed by the BLM in the DRECP planning area that do not have a conservation, recreation or renewable energy designation in the DRECP because they did not meet the criteria for any of those designations. The DRECP still includes specific management prescriptions for these lands. These areas would be open to renewable energy applications but would not benefit from streamlining or incentives. Renewable energy project applications would need to be consistent with the DRECP's renewable energy, conservation and recreation goals, and would need to leave surrounding conservation and recreation areas unaffected. The BLM would need to amend its land use plan to allow such a project in these areas.

**Q. How does the recent designation of three new desert monuments affect the land allocations in the DRECP?**

A. The Castle Mountain, Mojave Trails and Sand to Snow National Monuments were created by Presidential Proclamation on February 12, 2016, after release of the DRECP Final EIS. The BLM considered many of the objectives of the Mojave Trails and Sand to Snow National Monuments throughout the DRECP

planning process and identified protective measures or proposed designations for the lands contained within them. The DRECP decision retains these measures as interim management for the national monuments until monument management plans can be completed. These two monuments were added to the BLM's National Conservation Lands by virtue of the Proclamation. Therefore, the National Conservation Lands designations proposed in these areas in the DRECP have been removed.

The Castle Mountain National Monument has been transferred to the National Park Service and proposed BLM land use designations in that area have been removed.

**Q. How is the DRECP affecting the existing California Desert Conservation Area (CDCA) Plan and Multiple Use Classes?**

A. The BLM Land Use Plan Amendment is consistent with the original intent of the CDCA with a focus on conservation while adding designations for renewable energy development. The Land Use Plan Amendment eliminates the Multiple Use Classes (MUCs) in the CDCA Plan and replaces them with specific land use designations. Because the DRECP identifies renewable energy, conservation and recreation designations and specific management prescriptions for those allocations, retaining the MUCs would have created duplicative and potentially contradictory management prescriptions. Many of the concepts of the MUCs have been maintained, but with different names, consistent with standard BLM terminology.

**Q. Is the DRECP consistent with the West Mojave Route Network planning effort?**

A. Both the DRECP and West Mojave planning efforts propose land use planning changes to the California Desert Conservation Area Plan. The West Mojave planning area is completely within the DRECP boundary. The West Mojave project is narrower in scope than the DRECP and is currently

ongoing, working under court-ordered timeframes. Planning decisions proposed by both plans have been analyzed and found to be consistent. Implementation decisions such as travel management made through the West Mojave Route Network planning effort will be considered in the context of the DRECP and will be subject to the plan decisions in the DRECP.

**Q. How does the DRECP affect ongoing projects like the Soda Mountain Solar Project and the Eagle Mountain pumped hydroelectric storage project?**

A. The BLM approved the Soda Mountain Solar Project in April 2016. The project is not subject to decisions being made in the DRECP, however, the project is located on general public lands that would not be precluded from development under the DRECP. The Federal Energy Regulatory Commission licensed the Eagle Mountain pumped storage project in 2014, and thus the BLM considers that license to be a valid existing right. The BLM is currently processing a right-of-way for a pipeline, transmission line and other infrastructure associated with the project. That right-of-way will be subject to the relevant measures required by the DRECP.

**Q: How would solar development change under the DRECP, relative to the Western Solar Plan?**

A: The Western Solar Plan created Solar Energy Zones on public lands in six western states, including California. The DRECP builds upon and refines the decisions made in the Western Solar Plan. Key distinctions between the two plans are:

- The Western Solar Plan considered lands appropriate for solar energy only, while the DRECP includes solar, wind and geothermal energy development.
- The Western Solar Plan took a broad look across six western states, while the DRECP focuses only on the California desert region. This has allowed the DRECP to use finer-grain data in the planning process.

- The Western Solar Plan created solar exclusion areas where solar applications would not be accepted. The DRECP is taking the further step of designating conservation areas on public lands that would exclude renewable energy applications and also provide for the protection of ecological, cultural, recreational and other desert resources.
- The DRECP would maintain the development incentives and design features identified in the Western Solar Plan.

**Q. How does the DRECP relate to the BLM's proposed solar and wind competitive leasing regulations?**

A. The BLM's proposed wind and solar energy regulations would, among other things, create a competitive bidding process for solar and wind energy permitting. The Development Focus Areas created by the DRECP would be open for competitive leasing under those regulations. The BLM anticipates finalizing this rule in the near term.

**Q. What are the next steps after the Record of Decision?**

A. Now that the DRECP is approved, the BLM will begin implementing the plan. This will include applying the new land allocations to future actions and implementing the plan's Conservation and Management Actions.

**Q. How will Phase II of the DRECP proceed?**

A. In March 2015, the REAT agencies announced that the DRECP planning process would move forward in a phased manner to address public comments and the need to continue working with local governments on the non-federal portion of the plan focused on private lands.

Phase I centers on completing the BLM land use plan amendments for the DRECP planning area. The approved BLM amends existing land designations to create areas for renewable energy development and conservation areas on federal public lands.

Phase II centers on better aligning local, state and federal renewable energy development and conservation plans, policies and goals, which includes building off of the work done using Renewable Energy Conservation Planning Grants (RECPG) that were awarded by the California Energy Commission to counties in the plan area. These county planning efforts are critical because counties have primary land-use and permitting authority on private lands in their counties. The decision to use a phased approach did not impact that authority and did not change the process for permitting renewable energy projects on private lands.

Phase II planning efforts will be ongoing and the Energy Commission will regularly provide updates on the progress counties are making related to renewable energy development and conservation.

The U.S. Fish and Wildlife Service and the Bureau of Land Management stand ready to work with the California Energy Commission, Department of Fish and Wildlife and local governments to work through a Phase II approach.

