



California Wind Energy Association

March 1, 2023

Solar Energy PEIS Scoping
Bureau of Land Management
1849 C Street NW
Washington, DC 20240

Submitted via: <https://eplanning.blm.gov/eplanning-ui/admin/project/2022371/510>

Re: Comments on NOI to Prepare Programmatic Environmental Impact Statement to Evaluate Utility-Scale Solar Energy Planning and Amend Resource Management Plans for Renewable Energy Development

The California Wind Energy Association (“CalWEA”) respectfully submits the following comments on the 12/8/22 Notice of Intent to Prepare Programmatic Environmental Impact Statement to Evaluate Utility-Scale Solar Energy Planning and Amend Resource Management Plans for Renewable Energy Development (“Solar PEIS and Renewable RMP Amendments”). CalWEA is a 23-year-old trade association representing the interests of its member companies that own and develop wind energy projects within California and directly interconnected to the California grid.

In summary: CalWEA strongly encourages the Bureau of Land Management (“BLM”) to (1) conduct a separate effort to develop a PEIS focused exclusively on wind energy development in the Western States, and (2) to reevaluate the exclusion zones in the Desert Renewable Energy Conservation Plan (“DRECP”) for purposes of wind energy development.

Separate Treatment of Wind Energy Is Necessary in Developing RMPs and Amendments

The 2012 Western Solar Plan created Solar Energy Zones (“SEZs”) with no consideration for wind energy and its entirely different impacts and technology-based considerations. Executive Order 14008 was not limited to solar energy. A wholesale re-evaluation of the SEZs, and the areas where solar energy development was excluded, is necessary for proper consideration of where wind energy developments should be allowed to be proposed for site-specific consideration. This process should begin as soon as possible.

While solar resources are widespread with limited variations, wind energy resources are highly variable and site-specific. Unlike solar energy projects, wind energy projects cause limited ground disturbance (disturbing approximately 3% or less of the lease area) and are inherently flexible, allowing careful micro-siting of turbines to avoid potential impacts. This siting flexibility and small land-disturbance footprint makes wind energy inherently compatible with BLM’s multiple-use

goals, such as providing corridors for imperiled wildlife and backcountry recreation and protecting sensitive vegetation and habitat areas.

For these reasons, BLM should conduct a separate wind PEIS to determine which areas are potentially suitable for wind energy development, and where exclusion zones may be justified, across the five Western states for which SEZs have been developed and are being updated, and for any additional states where renewable RMPs are to be developed. The Wind PEIS should follow the same BLM standards and procedures that were used to develop the SEZs (e.g., Public Scoping, Tribal Consultations, Environmental Impact Considerations and Siting Exclusions, with independent analysis performed by qualified consultants).

Further, achievement of the Administration's 25-gigawatt renewable energy goal on public lands should consider the need to promote both wind and solar resource development, given the complementary diurnal profiles of these resources. A balanced portfolio of wind and solar resources requires substantially fewer resources overall.¹ In addition, CalWEA strongly encourages BLM to identify wind energy zones that are reasonably proximate to existing and planned transmission infrastructure, and to avoid excluding development of high-quality wind resources that are near such infrastructure. Lastly, sufficient wind energy resource development areas should be identified where military conflicts are not anticipated or are anticipated to be mitigatable.

The DRECP Exclusion Zones Should Be Re-Evaluated for Purposes of Wind Energy Development

When the DRECP was adopted in 2016, it was intended to encourage limited renewable energy development on federal lands in California, but it has had the opposite impact: to our knowledge, not a single wind energy application has been filed within the DRECP area since it was adopted, and all pre-existing applications were dropped. As part of its review of the DRECP RMPs, therefore, CalWEA strongly urges the Administration to carefully consider whether amendments to the DRECP are warranted as course corrections to enable the intended renewable energy development – and, specifically, the wind energy development – that will be necessary to achieve the administration's climate policy goals.

Reconsideration of the DRECP is justified for numerous reasons:

- 1. Consistency with the Energy Act of 2020.** As the NOI notes, this act directs the Secretary to “seek to issue permits that, in total, authorize production of not less than 25 gigawatts of electricity from wind, solar, and geothermal energy projects by not later than 2025, through management of public lands and administration of Federal laws.” Review of the DRECP is clearly consistent with, and a necessary response to, this directive, particularly given the

¹ See, e.g., Mahone, Amber, Zachary Subin, Jenya Kahn-Lang, Douglas Allen, Vivian Li, Gerrit De Moor, Nancy Ryan, Snuller Price. 2018. *Deep Decarbonization in a High Renewables Future: Updated Results from the California PATHWAYS Model*. California Energy Commission. Publication Number: CEC-500-2018-012. This study showed that the resource diversity provided by out-of-state wind energy resources would reduce California's needed solar and storage resources by approximately 40 percent. (See Figure 16.)

DRECP's proximity to California's large electricity loads and the state's ambitious greenhouse gas reduction goals.

- 2. Failure of the DRECP to Promote Renewable Energy Development Consistent with Its Own Goals.** As stated in the 2016 Executive Summary of the Record of Decision for the DRECP, the Land Use Plan Amendment (LUPA) to the three Resource Management Plans that constitute the public-lands component of the DRECP, the Development Focus Areas (DFAs) designated by the LUPA were intended to accommodate more than 8,100 megawatts (MWs) of renewable energy development. That goal included a planning target of 3,070 MW of wind energy development. What has been experienced since the development and 2016 adoption of the DRECP, however, is an almost total collapse of development activity on BLM land in the DRECP area. In the case of wind energy, approximately a dozen wind energy projects were being pursued at the time that the DRECP effort was announced in late 2008; none of those projects survived the DRECP process and, to our knowledge, no wind energy applications have been filed with the BLM in the seven years since the DRECP was adopted despite strong demand for renewable energy.
- 3. Failure of the DRECP to Promote Wind Energy Development Consistent with California's Clean Energy Needs.** The California Public Utilities Commission's resource planning goals include 3,553 megawatts (MW) of California wind energy development in the 2025-2032 timeframe.² California's study of how it will meet 100 percent of retail electricity sales with zero-carbon resources by 2045 show that 12,600 MW of wind energy from California and the West will be required by 2045, in addition to 10,000 MW of offshore wind.³ And yet wind energy generation in California has remained relatively flat⁴ since the DRECP was adopted, as much of the state's limited high-quality wind resources on private land have been developed and further development on private land has proved difficult. (Unlike wind energy, solar energy is relatively ubiquitous; thus, California has seen more than a doubling of solar energy generation since 2016.)
- 4. Failure of the DRECP to Evaluate the Compatibility of Wind Energy with Other DRECP Objectives or to Preserve High-Quality Wind Resources for Evaluation and Potential Development.** The DRECP made only 4% of 10.8 million acres managed by the BLM available as renewable energy development focus areas. The impact of the plan on wind energy was even more severe than this statistic suggests in that approximately 96% of the high-quality wind resources on BLM land within the DRECP area were put off limits to developers because of the new land designations made for conservation. DRECP officials revealed to CalWEA after the plan's adoption that, indeed, preserving high-quality wind resource areas was simply not an objective of the planning effort.

In applying wind energy exclusions, moreover, the DRECP did not specifically evaluate site-specific conditions for the potential compatibility of wind energy with other DRECP

² CPUC Decision 22-02-004 at Table 2 (February 10, 2022).

³ See California's SB 100 Joint Agency report (2021), available at <https://www.energy.ca.gov/sb100>.

⁴ See California Energy Commission's "Tracking Progress – Renewable energy" (February 2020) at Figure 7. https://www.energy.ca.gov/sites/default/files/2019-12/renewable_ada.pdf.

objectives. The Plan did not take into consideration the fact that wind energy projects cause limited ground disturbance and are inherently flexible, allowing careful micro-siting of turbines to avoid potential impacts. This siting flexibility and small footprint makes wind energy inherently compatible with BLM's multiple-use goals, such as providing corridors for imperiled wildlife and backcountry recreation and protecting sensitive vegetation and habitat areas. Conflict was presumed, not demonstrated or documented.

CalWEA also highlights the fact that RMP amendments need not add acreage to the Development Focus Areas where permitting was ostensibly streamlined. Rather, amendments could simply remove categorical prohibitions against wind energy development, enabling site-specific study to determine whether development is compatible with other land uses and conservation objectives. Only a small fraction of the acreage opened to exploration would likely be developed, given the numerous considerations that go into successful wind energy projects.

For all the above reasons, CalWEA strongly urges BLM to carefully consider whether proposed amendments to the DRECP are warranted to enable wind energy development and to achieve Biden Administration and California goals to eliminate our country's dependence on carbon-based fuels and avoid the most catastrophic impacts of climate change.

CalWEA appreciates this opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Rader".

Nancy Rader
Executive Director