

CNPS Memorandum



Subject: Renewable Energy Development Talking Points

Renewable Energy Talking Points

- **Direct projects to degraded or disturbed areas**

The use of degraded lands limits the impact to natural resources. The use of degraded lands also requires a less intensive environmental review and is likely to reduce the time it takes to achieve project approval. *We cannot endorse the siting of utility-scale renewable energy projects on pristine desert lands as the first option, especially when already-disturbed alternative sites have been identified.*

- **Increase the number of projects directed to private lands**

Develop incentives for private land development of renewable energy projects. This would alleviate some of the demand on public lands while contributing directly to the local county's tax base.

- **Increase the focus on distributed renewable energy generation within communities**

Projects recently undertaken by utilities and cities in southern California and the Bay Area to install solar panels on rooftops and existing infrastructure should be supported and promoted. This approach develops the energy closer to energy end-users and protects natural resources. *We must increase incentives for community-based renewable energy generation and distribution.*

- **Increase the focus on energy conservation**

Fundamental to reducing our carbon footprint is reducing the total amount of energy used. *We must renew and expand energy conservation measures throughout the state.*

- **Develop a long-term plan for renewable energy development**

The US Bureau of Land Management's Solar Energy Study Area (SESA) Programmatic EIS, and the joint state and federal Desert Renewable Energy Conservation Plan (which must be created and approved as a Natural Community Conservation Plan (NCCP) pursuant to California Fish and Game Code sections 2800, et seq.) will engage in landscape level analysis for siting of renewable energy development in the California desert. This type of comprehensive planning is needed to address management actions that will ensure the long-term conservation of the desert ecosystem. *Conservation planning through these two processes must be integrated and consider **all** project applications, including those currently progressing through entitlement and certification phases outside of a more comprehensive landscape level planning approach.*

- **Ensure environmental review is not eliminated or truncated on public lands**

Environmental review is necessary to identify and protect public trust values. Completion of such reviews is critical to fulfilling the promise of "green" and renewable energy. Local, state, and federal agencies involved in project application review and certification must adhere to all applicable laws, ordinances, and regulations relating to proper environmental review. *Specifically, we would strongly oppose any efforts to ignore requirements to address impacts to CNPS List 1 and List 2 plants during the California Energy Commission's (CEC's) CEQA-equivalent environmental review process. Additionally, CNPS would strongly oppose an effort to put together*

a type of artificial NCCP in which the CEC is not subject to the requirements and permit conditions associated with receiving take authorization under the NCCP.

- **Ensure project botanical surveys are designed and performed appropriately**

Botanical information collected as part of project environmental assessments must be designed in a manner to obtain an accurate census of botanical conditions. We recommend conducting surveys according to CNPS *Botanical Survey Guidelines* and the California Department of Fish & Game *Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities*.

- **Ensure projects are located near existing transmission lines**

Projects sited near electricity end-users will reduce the need for new transmission corridors and decrease the efficiency loss associated with extended energy transmission. A smaller transmission footprint will lessen the impacts on the environment and reduce infrastructure costs.

- **Minimize groundwater use associated with renewable energy generation**

Use of groundwater resources for renewable energy generation, especially in desert habitats, must be avoided to prevent further habitat degradation and allocation disputes resulting from decreased availability of this already limited resource.

- **Employ criteria that identify *areas to avoid* when siting projects**

CNPS believes the following criteria need to be used to identify areas to be avoided when siting renewable energy projects:

- Locations that support sensitive biological resources, including: federally designated and proposed critical habitat; significant populations of federal or state threatened and endangered species, significant populations of sensitive, rare and special status species, including CNPS List 1B and List 2 species, and rare or unique plant communities.
- Areas of Critical Environmental Concern, Wildlife Habitat Management Areas, proposed HCP and NCCP Conservation Reserves.
- Lands purchased for conservation including those conveyed to the BLM. Landscape-level biological linkage areas required for the continued functioning of biological and ecological processes.
- Proposed Wilderness Areas, proposed National Monuments, and Citizens' Wilderness Inventory Areas.
- Wetlands and riparian areas, including the upland habitat and groundwater resources required to protect the integrity of seeps, springs, streams or wetlands.
- National Historic Register eligible sites and other known cultural resources.
- Locations directly adjacent to National or State Park units.