

II.8 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD

Throughout the planning phase of the Draft DRECP and EIR/EIS, agencies and stakeholders suggested and refined a number of reserve design and renewable energy development alternatives. Alternatives were also identified during the public scoping process. The BLM first published a Notice of Intent (NOI) under the National Environmental Policy Act (NEPA) to prepare an EIS for the DRECP and LUPA on November 20, 2009 in the Federal Register (see Volume V for more information on the scoping process). The BLM and USFWS as co-lead agencies published a NOI to prepare an EIS for their respective proposed actions in the Federal Register on July 29, 2011; a Notice of Preparation (NOP) for an EIR under the California Environmental Quality Act (CEQA) was published on the same date. The public comment period ended on September 12, 2011. The BLM published a Notice of Amendment to the NOI in the Federal Register on April 4, 2012, to initiate scoping for possible amendments of Resource Management Plans under the California Desert Conservation Area Plan in the DRECP Plan Area. The purpose of the public scoping periods was to receive comments, suggestions, and other information regarding the scope of issues and alternatives to be addressed in the Draft EIR/EIS and amendments to the BLM Resource Management Plans. Scoping comments regarding alternatives are summarized below. (A more complete summary of scoping comments is included in the Draft DRECP and EIR/EIS Scoping Report (Appendix T)).¹

As part of the scoping process, commenters suggested that:

- The EIR/EIS should describe the development of each alternative, how it addresses the project's objectives and implementation, and should include a discussion of the different types of renewable energy technologies that may be developed (Comment 1-2A).
- The EIR/EIS should identify areas with potential use conflicts and make specific recommendations for reducing conflict (Comment 1-3A).
- Alternatives analyses under Section 404² of the Clean Water Act vary from analyses under NEPA and must include both on-site and off-site alternatives, which may include private land, BLM-administered land, and/or disturbed sites (Comment 1-20A).

¹ Information regarding the Draft DRECP and EIR/EIS scoping is available at: <http://www.drecp.org/nepaceqa/> or see Appendix T, Scoping Report.

² Section 404 of the Clean Water Act establishes a program to regulate the discharge of dredged or fill material into waters of the United States. The program is jointly administered by the U.S. Army Corps of Engineers and the Environmental Protection Agency. The fundamental rationale of the program is that no discharge of dredged or fill material should be permitted if there is a practicable alternative that would be less damaging to our aquatic resources or if significant degradation would occur to the nation's waters. Permit review and issuance follows a sequence process that encourages avoidance of impacts, followed by minimizing impacts and, finally, requiring mitigation for unavoidable impacts to the aquatic environment.

- Preferred alternatives (in both draft and final form) should include detailed maps showing closures, restrictions, and the conservation status of all areas in DRECP planning areas, and disclose known and planned mitigation areas (Comment 11-4A).
- Proposed actions should continue to authorize, maintain, and enhance the recreational use of land in the DRECP Planning Area (Comment 14-3A).
- The EIR/EIS should plan for a wide range of realistic desert renewable energy development scenarios through 2050 (Comment 18-5A).
- The NOI does not include a possible range of alternatives. Phasing renewable energy development at different scales, different levels of development, and setting different levels of energy need and a low-impact alternative is recommended (Comment 20-10A).
- Alternatives in the NOP/NOI should be modified (Comment 21-2A).
- An alternative is needed that considers less use of energy (renewable or otherwise) within both regional and No Action areas (Comment 22-11A).
- The DRECP should be conservation driven with various alternatives formulated around a range of conservation opportunities or alternatives (Comment 23-1A).
- Alternatives should consider opportunities for energy conservation and small-scale generation facilities near cities and towns in the California Desert Conservation Area (CDCA), including rooftop solar panels and distributed generation at the site of energy consumption (Comment 20-18PD; Comment 10-2A, 22-12A, 25-20A; Comment 31-1A; Comment 33-3A).
- The DRECP boundary should be expanded to include a greater portion of San Diego County (Comment 19-1A).
- DRECP Planning Area should include the western end of Antelope Valley in Los Angeles and Kern counties (Comment 20-19A).
- Areas that should be avoided include those that support a high density of wintering or migratory birds, contain high raptor activity or breeding, and wintering of migrating populations of less abundant species. Avoid the take of eagles and areas that overlap with the California condor (Comment 1-26A; Comment 1-36BR; Comment 18-2A).
- The DRECP should preserve as much of Priority Wind Resource areas as possible (Comment 18-1A).
- The EIR/EIS should consider the potential conservation and development of military lands, other federal lands, and state lands to expand development and conservation opportunities (Comment 24-3A).

- The DRECP should exclude regional linkages identified for the town of Apple Valley (Comment 27-1a).
- The DRECP should steer development onto previously disturbed and private lands (Comment 1-6A and 25-11A; Comment 35-1A; Comment 36-4A).
- The DRECP should seek opportunities to develop portions of Imperial Valley and eastern Riverside (Comment 23-5A).
- The DRECP should avoid development at Ord Mountain Allotment (Comment 38-1A).

On December 17, 2012 the REAT agencies published an interim document entitled the *Description and Comparative Evaluation of Draft DRECP Alternatives*³ to provide stakeholders and the public a chance to review and provide feedback on plan alternatives. The public provided additional comments on alternatives that were considered but not advanced for further analysis. Multiple commenters noted that distributed generation, energy efficiency, and the siting of renewable energy on brownfield sites should be considered as components of a single alternative rather than as independent alternatives, see Section II.8.2.1. The Imperial Irrigation District (IID) suggested using the exposed playa areas near the Salton Sea for renewable energy development.

Many environmental groups⁴ noted that previous Sierra Club comments regarding the Energy Commission Acreage Calculator were not meant to be an alternative, but rather that the Sierra Club comments should serve to revise the energy calculator to adjust the amount of renewable energy analyzed for development in the DRECP Plan Area for all EIR/EIS alternatives. In response to this comment, the “Sierra Club Alternative” presented in the *Description and Comparative Evaluation of the Draft DRECP Alternatives* is not included in this Draft DRECP and EIR/EIS.⁵ As noted in Volume I, Section I.1.4, the State Objectives include planning for approximately 20,000 MW of renewable energy in the Plan Area by 2040. An alternative with less than approximately 20,000 MW would not meet this primary objective. The Energy Commission Acreage Calculator is discussed in Appendix F3 of the Draft DRECP and EIR/EIS and was discussed in depth throughout the DRECP planning process.⁶

³ Available at: http://www.drecp.org/documents/docs/alternatives_eval/index.php.

⁴ These environmental groups include: Defenders of Wildlife, Audubon California, California Native Plant Society, Center for Biological Diversity, Natural Resources Defense Council, Sierra Club and the Wilderness Society.

⁵ The Sierra Club Alternative can be reviewed in the “Description and Comparative Evaluation of the Draft DRECP Alternatives” Section 2.10.2.5, pg. 2.10-13, available at: http://www.drecp.org/documents/docs/alternatives_eval/Section_2_Description_of_Alternatives.pdf.

⁶ See DRECP website, <http://www.drecp.org/documents/resources.html> Renewable Energy Acreage Calculator by the California Energy Commission (dated July 12, 2012).

Some of the alternatives suggested in the DRECP Scoping Report and in other agency and stakeholder comments were generally incorporated into the alternatives considered in Chapters II.2 through II.7 (including the No Action Alternative, the Preferred Alternative, and four other alternatives). For example, an overlay of Development Focus Areas (DFAs) on agency-identified low-resource conflict areas has been incorporated in all the alternatives. Existing, approved projects were considered in setting the MW and acreage targets, but were not used to create a separate alternative. (See Section I.3.5 for the description of the renewable energy planning process and the estimated future generation capacity required in the Plan Area.) Another scoping recommendation was to site development within one mile of both existing or planned high-voltage lines and substations; all alternatives include DFAs near existing transmission lines.

Other alternatives suggested in public comments were either not described in sufficient detail to be considered or were outside of the scope of the DRECP, which is to provide for the long-term conservation and management of Covered Species in the Plan Area and to provide a streamlined approval process for renewable energy projects within the Plan Area. Examples include an energy efficiency-only alternative, an alternative that would incorporate more of San Diego County in the DRECP planning area boundary, an alternative that would include renewable energy development on military lands, and an alternative that would avoid development at the BLM-administered Ord Mountain Allotment for livestock grazing near Barstow.

Alternatives suggested by public comments were considered by the REAT agencies. Suggested alternatives that were not incorporated into one or more of the action alternatives are described below, along with the rationales for not incorporating them in alternatives evaluated in this document.

II.8.1 Context for Alternatives Considered but Not Carried Forward for Detailed Analysis

NEPA and CEQA define categories of alternatives to be considered but not analyzed in detail. Relevant sections of these laws are summarized in Sections II.8.1.1 and II.8.1.2.

Alternatives evaluated in detail in the Draft DRECP and EIR/EIS must meet the objectives, REAT agencies' purposes and needs, and the regulatory framework described in Volume I. The BLM's and USFWS' statements of purpose and need and the CEC's, CDFW's, and CSLC's objectives set the context for the development and analysis of alternative scenarios. Alternatives that do not meet most of the agencies' basic purposes for the DRECP, as expressed in these statements, or that duplicate features already included in alternatives carried forward for detailed analysis in the DRECP, will not be analyzed in full detail.

II.8.1.1 NEPA Requirements for Alternatives

According to the Council on Environmental Quality's (CEQ's) NEPA regulations (40 C.F.R. 1500.1 et seq.), an EIS must present the environmental impacts of a proposed action and alternatives in a comparative form that defines the issues and provides a clear basis for choice by both decision makers and the public (40 C.F.R. 1502.14). The alternatives section in an EIS should also rigorously explore and objectively evaluate all reasonable alternatives. For alternatives that were eliminated from detailed study, the EIS should also briefly discuss the reasons for their elimination. In addition, alternatives should be evaluated in the context of the underlying purpose and need to which the agency is responding in proposing the alternatives, including the proposed action (i.e., DRECP Preferred Action) (40 CFR 1502.13; also see Volume I, Chapter I.1).

Consistent with CEQ's NEPA regulations regarding an action agency's purpose and need (40 C.F.R. 1502.13) the alternatives below were not carried forward for additional analysis. These alternatives did not meet the purpose and need of either federal co-lead agency (BLM and USFWS) (see Volume I, Chapter I.1) or were determined to be practically or technically infeasible (40 C.F.R. 1502.14).

II.8.1.2 CEQA Requirements for Alternatives

An important aspect of EIR preparation is the identification and assessment of reasonable alternatives that would avoid or substantially lessen the significant impacts of a proposed project. The CEQA guidelines require consideration of a range of reasonable alternatives but do not require an agency to consider every conceivable alternative to a project (Section 15126.6 (a)). The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify alternatives that were considered by the lead agency but rejected from detailed analysis and briefly explain the reasons underlying the lead agency's decision (Section 15126.6(c)). Among the factors that may be used to eliminate an alternative from detailed consideration in an EIR are that the alternative fails to meet most of the basic project objectives, that it is infeasible, or that it does not avoid significant environmental impacts.

A key CEQA requirement for an alternative is that it has the potential to "avoid or substantially lessen any of the significant effects of the project" (CEQA Guidelines Section 16126.6(a)). If an identified alternative clearly does not have the potential to provide an overall environmental advantage (as compared to the proposed project), it is usually eliminated from further consideration.

II.8.2 Description and Rationale for Alternatives Considered but Not Carried Forward for Detailed Analysis

The following alternatives were considered but were not included in the draft alternatives analyzed in this document.

1. Distributed Generation Alternative
2. Center for Energy Efficiency and Renewable Technologies (CEERT) Proposed Solar Areas Alternative
3. California Wind Energy Association (CalWEA) Proposed Wind Areas Alternative
4. BLM Lands Alternative
5. Private and Previously Disturbed Lands Alternative
6. Dispersed Development Alternative
7. Southeast Emphasis Alternative
8. Avian Avoidance Alternative

The summaries below provide a brief description of each rejected alternative along with the rationale explaining why the alternative was not analyzed in detail.

II.8.2.1 Distributed Generation Alternative

Alternative Description. A number of comments were received during the public scoping period suggesting that the agencies evaluate renewable distributed generation as opposed to, or in addition to, the development of centralized, utility-scale renewable energy facilities. Commenters suggested the DRECP consider opportunities for distributed generation in combination with energy conservation and sited near point of use both in and outside the Plan Area.

Distributed generation refers to the installation of small-scale solar energy facilities at individual locations at or near the point of consumption. The *2011 Integrated Energy Policy Report* published by the CEC defines distributed generation as: “(1) fuels and technologies accepted as renewable for purposes of the Renewable Portfolio Standard (RPS); (2) sized up to 20 MW; and (3) located within the low-voltage distribution grid or supplying power directly to a consumer” (CEC 2012b).

Distributed generation, as traditionally defined, has a number of benefits, including local electricity reliability, elimination of the need for some new transmission lines, and compatibility with urban areas. After energy efficiency and demand response, California has prioritized its preferred energy supply resources as (1) renewable energy, (2)

combined heat and power, and distributed generation, and (3) clean and most-efficient conventional generation.

As discussed in Volume I, Section I.3.5, current research indicates that development of both distributed generation and utility-scale renewable energy will be needed to meet California's RPS and climate change goals, along with other energy resources and energy efficiency technologies (NREL 2010; Linvill et al 2011; California Office of the Governor 2012; Zichella and Hladik 2013). For a variety of reasons (e.g., upper limits on integrating distributed generation into the electric grid, cost, lack of electricity storage in most systems, and continued dependency of buildings on grid-supplied power), distributed energy generation alone cannot meet the goals for renewable energy development. Ultimately, both utility-scale and distributed generation renewable energy development will need to be deployed at increased levels, and the highest penetration of solar power overall will require a combination of both types (NREL 2010).

As noted in multiple scoping comments, Governor Jerry Brown's Clean Energy Jobs Plan identifies the goal to install 20,000 MW of new renewable capacity by 2020, including 12,000 MW of local electricity generation from small generation sources such as distributed generation (CEC 2011). In 2011, Governor Brown convened a conference with representatives of agencies, businesses, and organizations that would be involved in or affected by the 12,000 MW goal during which a series of expert-led panels identified the most critical barriers to achieving this goal and solutions to these barriers. Barriers included (Russell and Weissman 2012):

- Grid planning is the process where utilities, federal and state grid managers, and other stakeholders consider a range of long-term energy planning issues. Participants stated that the grid planning framework is disjointed and fails to adequately consider or plan for the potential grid impacts or benefits of local renewables.
- Integration and reliability concerns were highlighted due to local renewable generation being sent to the grid through power lines and equipment that were primarily designed to transport energy in the opposite direction. Unless managed appropriately, the integration of local renewable energy can impact the safe and reliable operation of distribution grids. Integration is hindered by a lack of information about the capacities and constraints of existing distribution grids.
- Financing and procurement poses challenges for all sizes of local renewables. Some financing strategies such as the new energy metering program and California Solar initiative promote widespread development of customer-side systems but many residents and businesses are still unable to buy or lease equipment or purchase renewable energy. Federal tax incentives and procurement programs stimulated rapid development but may expire or neglect key technologies, project sizes, or locations.

- Interconnection of a proposed energy generator to the power grid functions as a source of significant uncertainty and inefficiency. If a generator meets certain criteria it can take advantage of a “fast track” process but if not, the utility conducts a series of studies to determine the impacts to the grid. For local renewable generation, the interconnection process is critical because of the large number of interconnections that would be required. Concerns about the lack of alignment between the interconnection and procurement process were also highlighted.
- Permitting new renewable energy projects can also be challenging. Some cities and counties are pursuing renewable energy systems while others are not prepared to review or approve local renewable generation. Many cities and counties do not consider renewable energy in the planning codes and the requirements, permit fees, and local government expertise vary widely between jurisdictions, causing inefficiencies and increased costs. Local governments cited a lack of funds and time to update codes to address local renewable energy and the difficulty in keeping pace with the rapid development of local renewable technologies. Emergency responder representatives also discussed the challenge of understanding local renewables and new and emerging technologies.

The state is actively working to overcome barriers to the development of distributed renewable energy generation. In a 2011 report on renewable Energy Development in California, the California Energy Commission discussed barriers to the development of distributed generation, as well as potential solutions to overcome those barriers (CEC 2011). The Energy Commission followed up in its 2012 Renewable Energy Action Plan, included as part of the 2012 IEPR Update, with a number of specific recommendations for actions that are necessary to develop and integrate distributed generation in California (CEC 2012c). The Energy Commission is working with a variety of stakeholders, including the California Public Utilities Commission, the California Independent System Operator, community and environmental justice groups, and federal agency partners, to implement the recommendations in the Renewable Energy Action Plan and accelerate the development of distributed renewable energy generation in California.

Consistent with these efforts, DRECP alternatives evaluated in this EIR/EIS include utility-scale distributed generation, and the DRECP Renewable Energy Calculator assumes a high level of rooftop solar distributed generation as requested by the commenters. Specifically, the DRECP Renewable Energy Acreage Calculator and the 2040 Revised Scenario’s Renewable Portfolio⁷ (revised July 27, 2012) anticipates 7,000 MW of small rooftop solar distributed generation and more than 9,000 MW of ground-mounted distributed generation that may be needed for the state to be on track in 2040 to meet its 2050 greenhouse gas emissions reduction targets. Over 25% of the ground-mounted distributed generation is assumed to be located in the DRECP. As

⁷ Available at: http://www.drecp.org/documents/docs/DRECP_Acreage_Calculator_Documentation.pdf.

such, each of the action alternatives incorporates at least 1,700 MW of ground-mounted utility-scale distributed generation rated at 20 MW.

Consistency with Purpose and Need and Objectives. Under the Distributed Generation Alternative, the DRECP would not plan for the development of utility-scale renewable energy facilities larger than 20 MW, but instead assume that future greenhouse gas and emission reduction goals will be achieved exclusively through distributed generation. This would not meet the interagency goal because it does not provide a streamlined process for the development of utility-scale renewable energy and does not provide for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area.

The Distributed Generation Alternative would not respond to the BLM's purpose and need for agency action in the EIR/EIS because it would not advance the federal orders and mandates that compel the BLM to evaluate renewable energy projects on federally administered lands (see Volume I, Section I.1.2). It would not respond to the BLM's purpose to conserve biological, physical, cultural, social, and scenic values of the CDCA because it would not identify and incorporate public lands managed for conservation purposes within the CDCA.

The Alternative partially responds to the USFWS's purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because sensitive desert habitats would not be disturbed by large, utility-scale solar facilities. However, this alternative would not respond to the USFWS's purpose and need to advance DOI's national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI's highest priorities.

The Distributed Generation Alternative could partially meet the CEC, CDFW, and CSLC objectives to contribute to California's RPS and greenhouse gas reduction mandates and goals by planning for approximately 20,000 MW of renewable energy and transmission in the Plan Area. It would only partially meet the objective of accommodating and minimizing the potential environmental impact of utility-scale renewable energy generation sufficient to accommodate foreseeable demand in Plan Area through 2040. It would also not meet the objective because it would not provide for the long-term conservation and management of Covered Species within the DRECP.

Rationale for Elimination. Because the Distributed Generation Alternative conflicted with the DRECP goals and with the purpose and need and objectives of one or more of the REAT agencies, the alternative did not advance for further analysis. Utility-scale distributed generation has been incorporated into each of the DRECP alternatives, and substantial

development of additional local distributed renewable energy generation was assumed in estimating the potential for renewable energy development in the DRECP area through the CEC's renewable energy calculator.

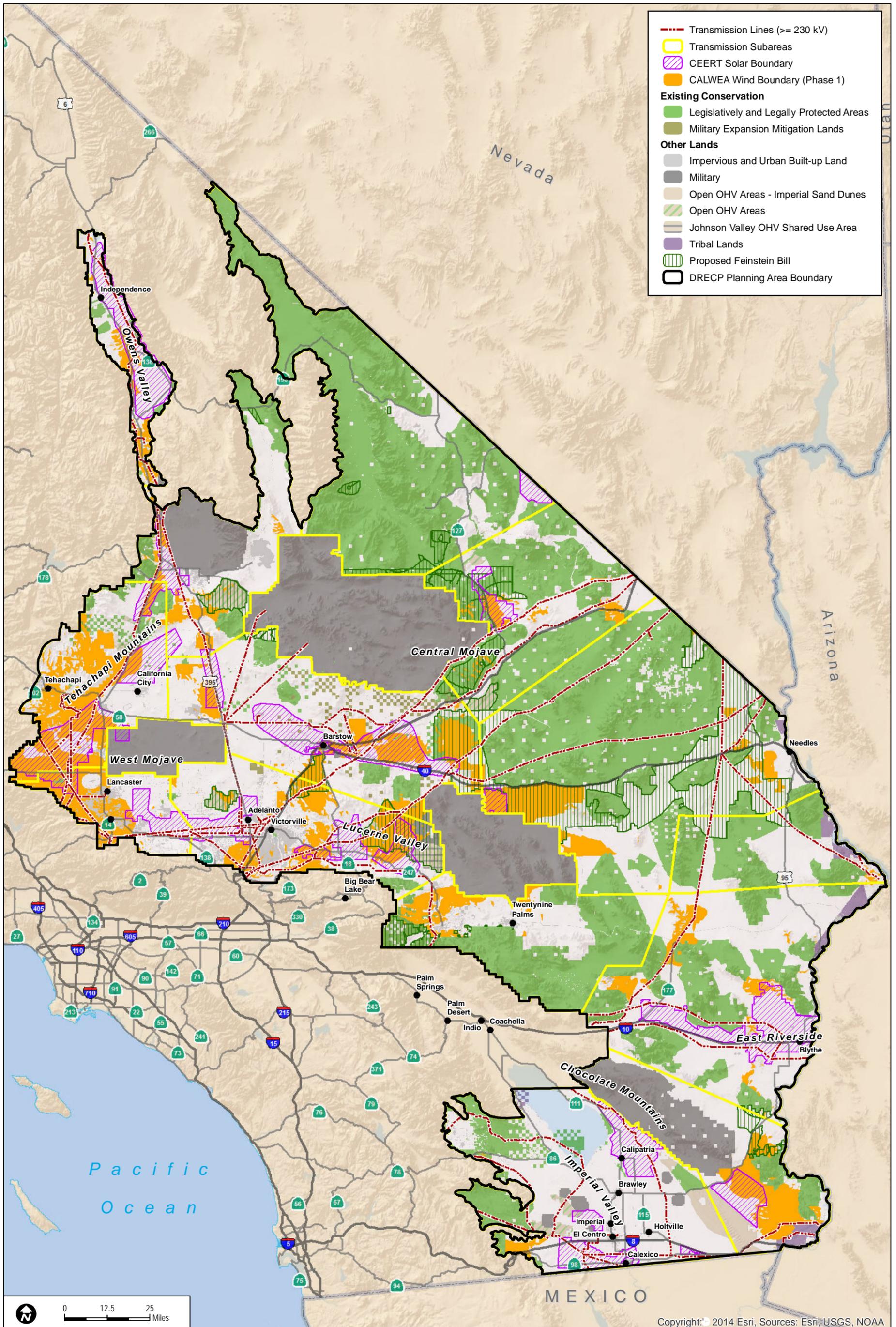
II.8.2.2 CEERT and LSA Proposed Solar Areas Alternative

Alternative Description. In August 2011, CEERT and the Large-scale Solar Association (LSA) submitted maps identifying more than 2 million acres suitable for the development of solar energy generation (CEERT 2011a). These areas have optimal characteristics for large-scale solar project development: above-average sun exposure (insolation), appropriate slope, and proximity to transmission. CEERT and LSA also noted that areas with many small, separately owned parcels ("parcelization") can inhibit the efficient development of larger-scale solar energy generation. The majority of the areas identified are within the West Mojave highlands surrounding Edwards Air Force Base, as well as the Lucerne Valley, West Chocolate Mountains, southern Imperial Valley, and eastern Riverside County. The areas proposed by CEERT and LSA are illustrated in Figure II.8-1.

Consistency with Purpose and Need and Objectives. The CEERT Proposed Solar Areas Alternative would meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy. It would partially meet the goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area because some of the locations identified in the Alternative conflict with this goal.

The CEERT Proposed Solar Areas Alternative would respond to the BLM's purpose and need for agency action in the EIR/EIS including the federal orders and mandates that compel the BLM to evaluate renewable energy projects on federally administered lands (see Volume I, Section I.1.2). It would partially respond to the BLM's purpose to conserve biological, physical, cultural, social, and scenic values of the CDCA and identify and incorporate public lands managed for conservation purposes within the CDCA.

The Alternative would only partially respond to the USFWS's purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because large areas of sensitive desert habitat would be destroyed. However, this alternative would respond to the USFWS's purpose and need to advance DOI's national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI's highest priorities.



Sources: ESRI (2014); CEC (2013); BLM (2013); CDFW (2013); USFWS (2013); Platts (2011)

FIGURE II.8-1

DRECP Plan-Wide Energy Assumptions - CEERT, LSA, and CalWEA Proposals

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The Alternative would only partially respond to the USFWS’s purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because large areas of sensitive desert habitat would be destroyed. However, this alternative would respond to the USFWS’s purpose and need to advance DOI’s national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI’s highest priorities.

The CEERT Proposed Solar Areas Alternative would only partially meet the objective of accommodating and minimizing the potential environmental impact of utility-scale renewable energy generation sufficient to accommodate foreseeable demand in Plan Area through 2040 because some of the locations would not minimize impacts. It would meet the CEC, CDFW, and CSLC objectives to contribute to California’s RPS and greenhouse gas reduction mandates and goals by planning for approximately 20,000 MW of renewable energy and transmission in the Plan Area. It would partially meet the objective of providing for the long-term conservation and management of Covered Species within the DRECP.

Rationale for Elimination. The CEERT Proposed Solar Areas Alternative would meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy but would only partially meet the interagency goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area because some of the locations suggested would result in significant resource conflicts. The locations suggested by the Alternative that did not result in significant resource conflicts were included in the alternatives analyzed in detail in this EIR/EIS. The EIR/EIS alternatives incorporate between 504,000 and 1,138,000 acres of the 2 million acres of solar development areas proposed by CEERT. This means that between 45% and 55% of the DFAs in the Draft EIR/EIS alternatives are the same lands as those identified in the CEERT Proposed Solar Areas Alternative. Table II.8-1 defines the acreage of the CEERT Alternative that was included in each of the retained alternatives.

**Table II.8-1
Acreage of CEERT and LSA Alternative Included in the Retained Alternatives**

Alternative	Acres Incorporated	Total DFA Acres	Percent of DFAs per Alternative
Preferred Alternative	965,104	2,027,760	48
Alternative 1	489,280	1,070,270	46
Alternative 2	1,350,579	2,475,381	55
Alternative 3	662,121	1,407,597	47
Alternative 4	872,184	1,608,292	54

Source: DRECP 2012a.

The CEERT Proposed Solar Areas Alternative identified locations that were not presented in the alternatives carried forward because they would affect sensitive resources. These locations include:

- Sensitive biological resources such as the Mojave River corridor (Barstow), Significant Ecological areas (Los Angeles County), BLM Flat-tailed Horned Lizard Management areas (Yuha Basin), habitat linkage areas (West Mojave)
- Conflicts with DFA exclusions related to the CDCA boundary along the Colorado River (East Riverside)
- Overlap with the proposed Mojave Trails National Monument (east of Barstow)
- Conflicts with DFA exclusions related to existing development in portions of the Owens Valley/West Mojave, Barstow, and Imperial County
- Conflicts with DFA exclusions related to open off-highway vehicle (OHV) use areas designated on BLM lands (Imperial County and the West Mojave areas)

Because the CEERT Proposed Solar Areas Alternative identified locations that conflicted with the DRECP goals and with the purpose and need and objectives of one or more of the REAT agencies, the alternative was not carried forward for further analysis. However, as described above, the CEERT solar development areas without resource conflicts or with limited conflicts are included in the Draft DRECP and EIR/EIS alternatives.

II.8.2.3 CalWEA Proposed Wind Areas Alternative

Alternative Description. CalWEA recommended that 2.3 million acres of land within the DRECP Plan Area be developable for wind energy DFAs, to be developed in two phases (CalWEA 2012a). Phase 1 would include all the CalWEA identified lands within 10 miles of a transmission corridor. It would have three categories of land: Wind DFAs, Neutral Areas, and Reserve Design Areas, as described below. CalWEA stated that avian and bat species would be addressed as an overlay to each of the categories described, and that in all areas developers would follow state and federal avian and bat siting guidelines.

- Wind DFAs include the highest-quality wind resources within 10 miles of an existing transmission corridor that do not overlap with lands classified as areas of special environmental concern. Projects in Wind DFAs would receive permit streamlining benefits for ground-dwelling (non-flying) species.
- Neutral Areas include lower-quality, potentially commercially viable wind resources and high-quality biological resources within Areas of Critical Environmental Concern (ACECs) and Desert Wildlife Management Areas (DWMAs) within 10 miles of existing transmission corridors. These areas would be open to conservation

efforts or wind development. Wind development may be subject to higher survey and mitigation requirements for ground-dwelling (non-flying) species.

- Reserve Design areas would prohibit wind development unless specifically determined to be compatible with the biological goals and objectives of the area.

Phase 2 would begin no later than 2020 and would include the portions of the 2.3 million acres of wind-energy developable lands identified by CalWEA that were not included in Phase 1. The Phase 2 lands would be evaluated as either Phase 2 DFAs or Neutral areas starting no later than 2017. The evaluation would be based on additional environmental data, experience in developing Phase 1 areas, the state of renewable energy market competition, achievement of the State's clean energy goals, and other factors.

CalWEA recommended that the DRECP plan for development of at least 25,000 MW of wind energy capacity. CalWEA assumed that more wind energy could be developed within the DRECP planning area than in the rest of the State. CalWEA calculated that 25,000 MW of wind development would require wind development leases or rights-of-way on about 4% of the DRECP planning area, and would impact less than 1% of the Plan Area in terms of land disturbance. The areas suggested by CalWEA are illustrated in Figure II.8-1.

Consistency with Purpose and Need and Objectives. The CalWEA Proposed Wind Areas Alternative would meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy. It would partially meet the goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area because some of the locations identified in the Alternative conflict with this goal.

The CalWEA Proposed Wind Areas Alternative would respond to the BLM's purpose and need for agency action in the EIR/EIS including the federal orders and mandates that compel the BLM to evaluate renewable energy projects on federally administered lands (see Volume I, Section I.1.2). It would partially respond to the BLM's purpose to conserve biological, physical, cultural, social, and scenic values of the CDCA because it would not identify and incorporate public lands managed for conservation purposes within the CDCA.

The Alternative would only partially respond to the USFWS's purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because large areas of wind facilities would be located in sensitive avian and bat habitats, including important habitats for golden eagles and California condors.

However, it would respond to the USFWS’s purpose and need to advance the DOI’s national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI’s highest priorities.

The CalWEA Proposed Wind Areas Alternative would only partially meet the objective of accommodating and minimizing the potential environmental impact of utility-scale renewable energy generation sufficient to accommodate foreseeable demand in Plan Area through 2040 because some of the locations would not minimize impacts. It could meet the CEC, CDFW, and CSLC objectives to contribute to California’s RPS and greenhouse gas reduction mandates and goals by planning for approximately 20,000 MW of renewable energy and transmission in the Plan Area. It would partially meet the objective of providing for the long-term conservation and management of Covered Species within the DRECP.

Rationale for Elimination. The CalWEA Proposed Wind Areas Alternative would meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy but would only partially meet the interagency goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area. The alternatives analyzed in this EIR/EIS incorporate development areas of between 521,000 to 1,507,000 acres of the 2.3 million acres of Wind DFAs proposed by CalWEA. As such, between 49% and 61% of the DFAs in the DRECP are the same as those identified in the CalWEA Proposed Wind Areas Alternative. Table II.8-2 defines the acreage of the CalWEA Alternative that was included in the analyzed alternatives.

**Table II.8-2
 Acreage of CalWEA Alternative Included in the Retained Alternatives**

Alternative	Acres Incorporated	Total DFA Acres	Percent of DFAs per Alternative
Preferred Alternative	1,083,178	2,027,760	53
Alternative 1	520,584	1,070,270	49
Alternative 2	1,506,500	2,475,381	61
Alternative 3	728,778	1,407,597	52
Alternative 4	965,032	1,608,292	60

Source: DRECP 2012a.

The remaining acres identified in the CalWEA Proposed Wind Areas Alternative were eliminated from detailed analysis due to the following resource conflicts:

- Sensitive biological resources such as high concentration of nesting golden eagles (Barstow and the Cady and Bristol mountains) and California condors (West Mojave and Owens Valley)
- Conflicts with the DFA 2-mile buffer applied to tribal lands (Imperial County and Chocolate Mountains)
- Overlap with the proposed Mojave Trails National Monument (east of Barstow)
- Existing wind development precludes use of some of the acres identified by CalWEA in portions of Imperial County (Ocotillo Wind Project)
- Conflicts with Department of Defense-identified locations with a high likelihood of unacceptable risk to national security⁸ (portions of West Mojave, Owens Valley, Imperial County, and South Barstow)

Because the CalWEA Proposed Wind Areas Alternative identified locations that conflict with the purpose and need and objectives for the Draft DRECP and EIS/EIR, the complete alternative was not retained. However, as explained above, up to 57% of the CalWEA proposed development areas with lower potential for resource conflicts are included in the Draft DRECP and EIR/EIS alternatives.

II.8.2.4 BLM-Only Lands Alternative

Alternative Description. The BLM Lands Alternative would locate all renewable energy developments streamlined by the DRECP on BLM-administered public lands. Renewable energy development on private land would not be streamlined under the DRECP and would be analyzed on a case by case basis by the agency with jurisdiction over the project. Approximately 10 million acres within the 22.6 million acre DRECP Planning Area are administered by BLM under the CDCA Plan, and under the Bishop, Caliente/Bakersfield, and eastern San Diego County Resource Management plans. Further detail regarding the BLM-administered lands is provided in Chapter III.14, BLM Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

⁸ The Department of Defense prepared background materials for the DRECP meeting July 25 and 26, 2012 that included figures indicating areas where wind towers would conflict with the Navy and Air Force high risk of adverse impact zones such as restricted airspace, terrain flight areas, or the Marine Corps Air Ground Combat Center Twentynine Palms Expansion, and that would result in an unacceptable risk to national security. The Department of Defense explained that this meant that if a DFA were established in such locations, the Department of Defense would closely scrutinize any projects and potentially object to a project at those locations. The figures are available at: http://www.drecp.org/meetings/2012-07-25-26_workshop/background/Department_of_Defense_Materials/Dept_of_Defense_Conflict_Areas_07_24_2012.pdf. This does not preclude development of wind within these areas as a Covered Activity, provided that the project proponent receives clearance for the project's development from the DoD Renewable Energy Clearinghouse.

Consistency with Purpose and Need and Objectives. The BLM Lands Alternative would partially meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy. However, by limiting the benefits of streamlining to projects on BLM land, it would have the effect of encouraging development on federal land, which is often less disturbed than private land. It would partially meet the goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area because some of the locations identified in the Alternative conflict with this goal.

The BLM Lands Alternative would respond to the BLM's purpose and need for agency action in the EIR/EIS including the federal orders and mandates that compel the BLM to evaluate renewable energy projects on federally administered lands (see Volume I, Section I.1.2). It would partially respond to the BLM's purpose to conserve biological, physical, cultural, social, and scenic values of the CDCA and identify and incorporate public lands managed for conservation purposes within the CDCA.

The Alternative would only partially respond to the USFWS's purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because large areas of sensitive habitats on BLM lands would be destroyed by renewable energy development. However, it would respond to the USFWS's purpose and need to advance the DOI's national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI's highest priorities.

The BLM Lands Alternative would limit projects to BLM land, so would only partially meet the objective of accommodating and minimizing the potential environmental impact of renewable energy generation that may foreseeably be developed in DRECP area through 2040. It could meet the CEC, CDFW, and CSLC objectives to contribute to California's RPS and greenhouse gas reduction mandates and goals by planning for approximately 20,000 MW of renewable energy and transmission in the Plan Area. It would also only partially meet the objective of providing for the long-term conservation and management of Covered Species within the DRECP. This alternative would not provide for the development and management of school lands in the Plan Area and any development on these lands would not be streamlined by the DRECP. Therefore the alternative would not meet the CSLC Objectives.

Rationale for Elimination. The BLM Lands Alternative would partially meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy but would limit this goal to public lands. It would only partially meet the interagency goal of providing for the long-term conservation and management of Covered

Species and other physical, cultural, scenic and social values within the Plan Area because it would provide for conservation and management only on public lands.

The retained alternatives incorporate DFAs that include between 81,000 to 720,000 acres of land of the 10 million acres administered by the BLM within the DRECP Plan Area. This means that between 8% and 29% of the DFAs are the same as those identified in the BLM Lands Alternative; moreover, each alternative evaluated in this document assumes renewable energy development on lands administered by the BLM. Table II.8-3 defines the acreage of the BLM Land Alternative that was included in each retained alternative.

**Table II.8-3
Acreage of BLM Land Alternative Included in the Retained Alternatives**

Alternative	Acres Incorporated	Total DFA Acres	Percent of Alternative DFAs
Preferred Alternative	370,186	2,027,760	18
Alternative 1	81,196	1,070,270	8
Alternative 2	720,469	2,475,381	29
Alternative 3	212,563	1,407,597	15
Alternative 4	258,219	1,608,292	16

Source: DRECP 2012a.

Siting of all renewable energy within the DRECP planning area on BLM land alone would not provide for balance or flexibility in siting renewable energy development on lands with less biological value; in some instances that siting would also not align with existing transmission corridors. BLM-administered land is located throughout the DRECP Planning Area, while transmission corridors generally parallel Interstate 15, Historic Route 66, Interstate 10, Interstate 8, Interstate 95, and the California border.

The REAT agencies' purpose and need and objectives for the Draft DRECP and Draft EIS/EIR include identifying the most appropriate locations within the planning area for development of renewable energy projects, while taking into account potential impacts to threatened and endangered species and sensitive natural communities. Limiting covered renewable energy development to BLM land would not meet the purpose and need and objectives because much of the BLM land within the DRECP Planning Area would conflict with the goals of protecting the most sensitive communities and would not use the best renewable energy resource areas for project development, some of which are located on private land. The alternative could result in more substantial conflicts with other resource values retained on BLM lands.

The Alternative would not be an interagency plan and would not meet the CSLC objectives. It would not require any action by USFWS to make incidental take permit decisions under Section 10(a)(1)(B) of the ESA related to renewable energy development on non-federal lands.

II.8.2.5 Private and Previously Disturbed Lands Alternative

Alternative Description. The Private and Previously Disturbed Lands Alternative would locate all renewable energy development streamlined by the DRECP on private lands that have been previously disturbed. Renewable energy development on federal or other public lands would not be streamlined under the DRECP and would be addressed on a case by case basis by the agencies with jurisdiction over the project. Approximately 1.8 million acres within the DRECP Planning Area are classified as disturbed land and agricultural land types⁹ (DRECP 2012a). Imperial County has the largest percentage of disturbed and agricultural land (includes active and fallow land) (33%). The private/disturbed land is located in the following counties:

- Imperial County – 600,000 acres
- Los Angeles County – 340,000 acres
- Riverside County – 150,000 acres
- San Bernardino County – 450,000 acres
- Kern County – 245,000 acres

These acres of private/disturbed development land could be significantly reduced depending on whether they are active agriculture lands. Active agriculture lands are potentially unavailable for renewable energy development because of ongoing use and various state and local practices and policies protecting agriculture lands.

Consistency with Purpose and Need and Objectives. The Private and Previously Disturbed Lands Alternative would partially meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy. It would partially meet the goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area. Some of the locations identified in the Alternative conflict with this goal.

The Private and Previously Disturbed Lands Alternative would not respond to the BLM's purpose and need for agency action in the EIR/EIS including the federal orders and mandates

⁹ In order to map disturbed land and agricultural land types, the DRECP used the Farmland Mapping and Monitoring Program categories that include Farmland of Local Importance, Farmland of Statewide Importance, Prime Farmland, Unique Farmland, and Disturbed. Additionally, a rural land cover type was developed for the DRECP based on a rural lands model that used road access data (DRECP 2011b)

that compel the BLM to evaluate renewable energy projects on federally administered lands (see Volume I, Section I.1.2). It could partially respond to the BLM's purpose to conserve biological, physical, cultural, social, and scenic values of the CDCA and identify and incorporate public lands managed for conservation purposes within the CDCA.

The Alternative would only partially respond to the USFWS's purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because important avian habitat in agricultural lands, particularly in the Imperial Valley, would be destroyed. This alternative would respond to USFWS's purpose and need to advance the DOI's national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI's highest priorities.

The Private and Previously Disturbed Lands Alternative would partially meet the objective of accommodating and minimizing the potential environmental impact of renewable energy generation that may foreseeably be developed in DRECP area through 2040. It could meet the CEC, CDFW, and CSLC objectives to contribute to California's RPS and greenhouse gas reduction mandates and goals by planning for approximately 20,000 MW of renewable energy and transmission in the Plan Area. It would partially meet the objective of providing for the long-term conservation and management of Covered Species within the DRECP but would limit this objective to private land.

Rationale for Elimination. Because the Private and Previously Disturbed Lands Alternative conflicted with the DRECP goals and with the purpose and need and objectives of one or more of the REAT agencies, the alternative did not advance for further analysis. The Private and Previously Disturbed Lands Alternative would partially meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy but would limit this goal to private lands. This Alternative would not respond to the BLM's and DOI's purpose to evaluate renewable energy projects on federally administered lands. Under this alternative, the BLM's role would be limited to providing for conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area.

The alternatives included in this document incorporate high levels of private and previously disturbed land, between 916,000 to 1,649,000 acres of the 1.8 million acres of private land within the DRECP Planning Area boundary. Between 67% and 86% of the DFAs in the retained alternatives are the same lands as those identified in the Private Land Alternative, and each alternative assumes that there will be some renewable energy development on private lands. Table II.8-4 defines the acreage of the Private and Previously Disturbed Lands Alternative that was included in each retained alternative.

**Table II.8-4
Acreage of Private and Previously Disturbed Land Alternative
Included in the Retained Alternatives**

Alternative	Acres Incorporated	Total DFA Acres	Percent of DFAs per Alternative
Preferred Alternative	1,568,942	2,027,760	77
Alternative 1	916,280	1,070,270	86
Alternative 2	1,649,377	2,475,381	67
Alternative 3	1,113,180	1,407,597	79
Alternative 4	1,271,803	1,608,292	79

Source: DRECP 2012a.

Siting renewable energy only on private land would not provide balance or flexibility in siting renewable energy development because there is limited private land throughout the DRECP Planning Area and the private land does not always correlate with areas with the highest energy resource values. In some instances, development on private land would not align with existing transmission corridors. Meeting statewide and federal renewable energy goals within the DRECP planning area boundary exclusively on private lands would result in substantial conflicts with current and proposed land uses on private lands. Some counties expressed concern that development of renewable energy on private land could impact county land-use programs and controls, and could negatively affect local economies, county resources, local character, jobs, property tax revenue, agriculture, and recreation and historical resources (County of Riverside 2011a, DRECP 2011a). Private lands that were not incorporated into the analyzed alternatives have high biological resource conflicts and do not align with DRECP purpose and need. For these reasons, the Private and Previously Disturbed Lands Alternative was not retained.

II.8.2.6 Dispersed Development Alternative

Alternative Description. The April 25–26, 2012 DRECP Stakeholder Committee Meeting discussed six renewable energy development scenarios, with potential DFAs ranging from “concentrated” to “dispersed” development. Development Scenario 6 was the most dispersed development scenario and provided the most flexibility for renewable energy development, as well as the greatest potential to respond to market constraints (DRECP 2012b). Development Scenario 6 included all of the potential development within the DRECP October 2011 Preliminary Conservation Strategy Renewable Energy Study areas and Solar Programmatic EIS Solar Energy zones, in addition to other industry-identified development areas (DRECP 2012b). This scenario also presented the highest potential conflicts with biological and non-biological resources and uses within the DRECP Plan Area. It included 4.6 million acres of DFAs: 57% were private, 39% were federal (BLM-

administered), and 4% were other (municipal, district) (DRECP 2012). Development Scenario 6 is illustrated in Figure II.8-2.

Consistency with Purpose and Need and Objectives. The Dispersed Development Alternative would meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy. It would partially meet the goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area because many of the locations identified in the Alternative conflict with this goal.

The Dispersed Development Alternative would respond to the BLM's purpose and need for agency action in the EIR/EIS including the federal orders and mandates that compel the BLM to evaluate renewable energy projects on federally administered lands (see Volume I, Section I.1.2). It would partially respond to the BLM's purpose to conserve biological, physical, cultural, social, and scenic values of the CDCA and identify and incorporate public lands managed for conservation purposes within the CDCA.

The Alternative would only partially respond to the USFWS's purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because large areas of high biological resource value would be destroyed. However, this alternative would respond to USFWS's purpose and need to advance DOI's national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI's highest priorities.

The Dispersed Development Alternative would only partially meet the objective of accommodating and minimizing the potential environmental impact of utility-scale renewable energy generation sufficient to accommodate foreseeable demand in Plan Area through 2040 because some of the locations would not minimize impacts. It could meet the CEC, CDFW, and CSLC objectives to contribute to California's RPS and greenhouse gas reduction mandates and goals by planning for approximately 20,000 MW of renewable energy and transmission in the Plan Area. It would partially meet the objective of providing for the long-term conservation and management of Covered Species within the DRECP.

Rationale for Elimination. The Dispersed Development Scenario would not concentrate renewable energy development in DFAs, so it could direct transmission to more environmentally constrained locations. It would result in higher biological resource conflicts than the alternatives carried forward; about 62% of the scenario would overlap with areas of potential conflict so this alternative would have higher biological conflicts than the alternatives carried forward (DRECP 2012b). Because the Dispersed Development Scenario identified locations that conflicted with the Draft DRECP and EIR/EIS purpose and need, the alternative was not advanced. However, almost 2.5 million acres of the

Alternative development areas that have lower potential resource conflict are included in the Draft DRECP and EIS/EIR alternatives.

II.8.2.7 Southeast Emphasis Alternative

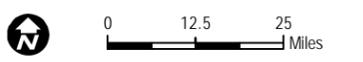
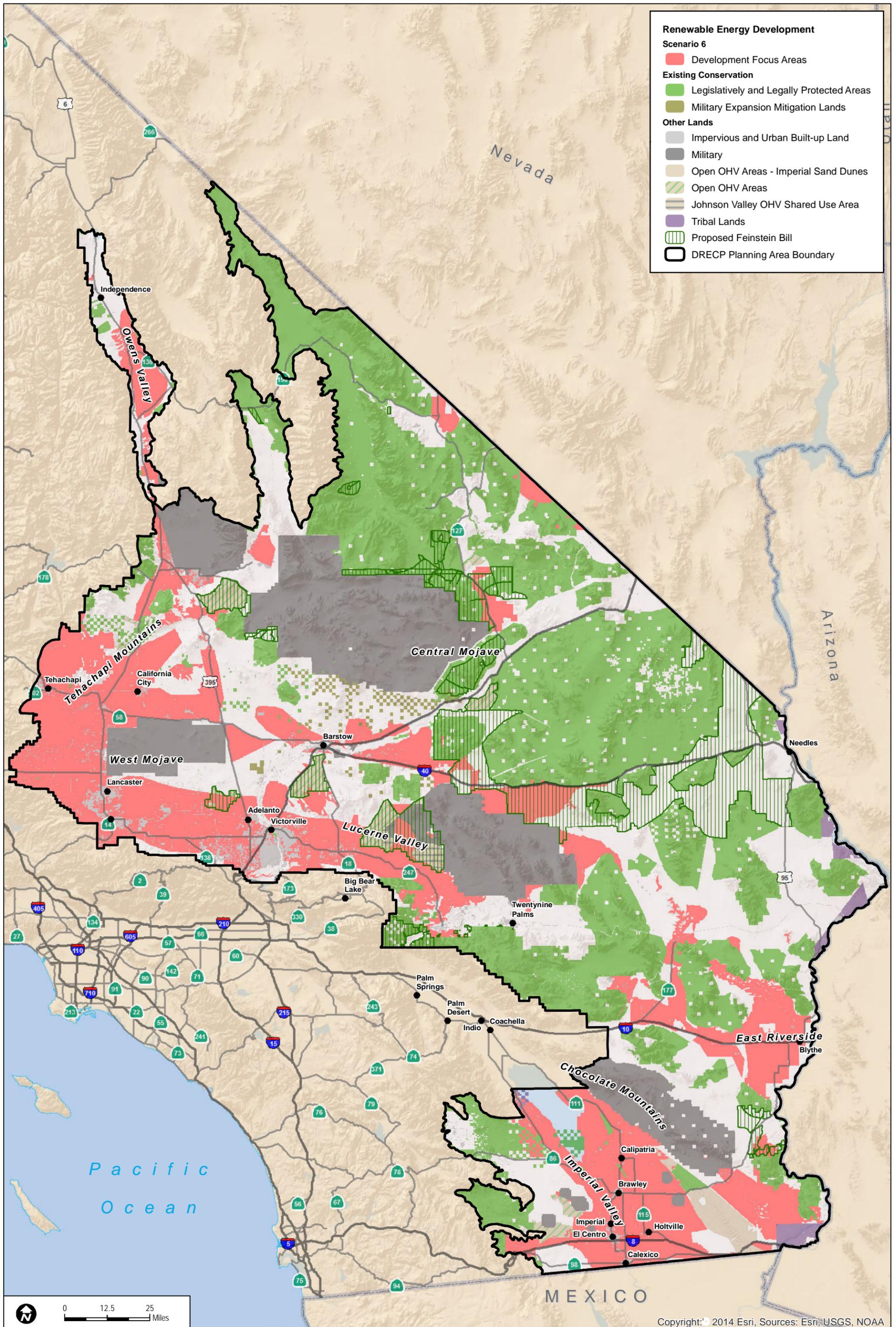
Alternative Description. This alternative was defined as the “Southeast Emphasis Alternative – Alternative 4” in the July 25, 2012, Overview of DRECP Alternatives – Briefing Materials. This alternative would focus development in the southeast portion of the DRECP planning area, including eastern Riverside County and Imperial County. The alternative assumed almost 15,000 MW of development in Imperial County and more than 4,000 MW of development in Riverside County with minimal development in other locations throughout the DRECP planning area (DRECP 2012a).

The alternative would include development both on public lands in the southeast portion of the Planning Area, and on private lands in Imperial County. It would include 1.29 million acres of DFAs, with about 406,000 acres of land administered by BLM (31% of the DFAs) and 820,000 acres of private lands (63% of the DFAs) (DRECP 2012a). It would include more than 545,000 acres of agriculture lands and more than 37,000 acres of dune communities (DRECP 2012a). The Southeast Emphasis Alternative would incorporate about 537,000 acres of the CEERT- and LSA-proposed solar areas and about 290,000 acres of the CalWEA-identified wind areas (DRECP 2012a). The alternative is illustrated in Figure II.8-3.

Consistency with Purpose and Need and Objectives. The Southeast Emphasis Alternative would meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy. It would partially meet the goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area because some locations would conflict with this goal.

The Southeast Emphasis Alternative would respond to the BLM’s purpose and need for agency action in the EIR/EIS including the federal orders and mandates that compel the BLM to evaluate renewable energy projects on federally administered lands (see Volume I, Section I.1.2). It would partially respond to the BLM’s purpose to conserve biological, physical, cultural, social, and scenic values of the CDCA and identify and incorporate public lands managed for conservation purposes within the CDCA.

The alternative would only partially respond to the USFWS’s purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because large areas of sensitive desert habitats and avian agricultural habitats would be destroyed. However, this alternative would respond to USFWS’s purposed and need to advance DOI’s national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI’s highest priorities.

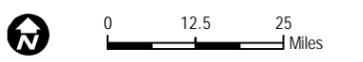
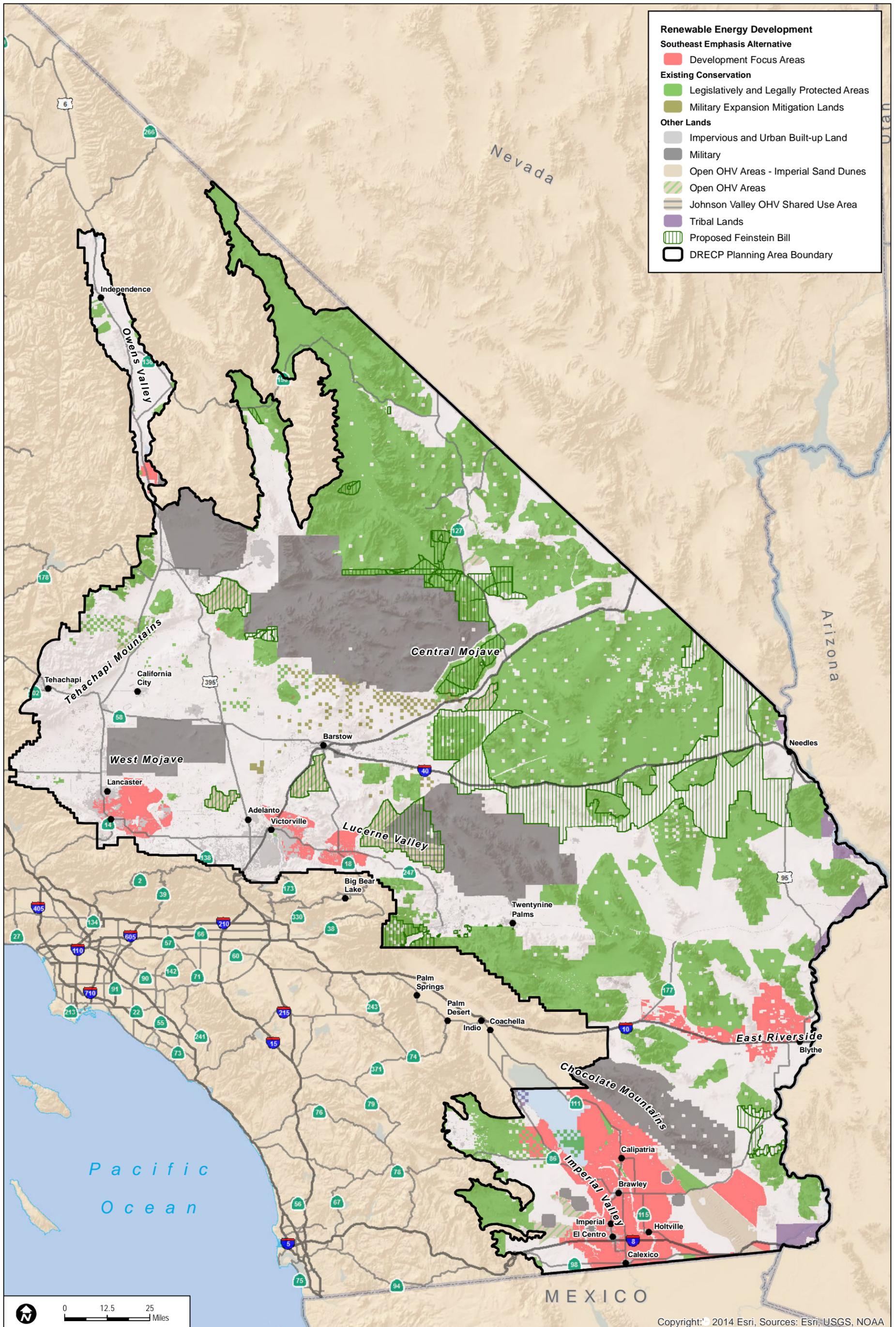


Sources: ESRI (2014); CEC (2013); BLM (2013); CDFW (2013); USFWS (2013)

Copyright: © 2014 Esri, Sources: Esri, USGS, NOAA

**FIGURE II.8-2
Scenario 6**

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Sources: ESRI (2014); CEC (2013); BLM (2013); CDFW (2013); USFWS (2013)

Copyright: © 2014 Esri, Sources: Esri, USGS, NOAA

**FIGURE II.8-3
Southeast Emphasis Alternative**

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The Southeast Emphasis Alternative would only partially meet the objective of accommodating and minimizing the potential environmental impact of utility-scale renewable energy generation sufficient to accommodate foreseeable demand in Plan Area through 2040 because it may not accommodate sufficient utility-scale renewable energy. It could meet the CEC, CDFW, and CSLC objectives to contribute to California's RPS and greenhouse gas reduction mandates and goals by planning for approximately 20,000 MW of renewable energy and transmission in the Plan Area. It would partially meet the objective of providing for the long-term conservation and management of Covered Species within the DRECP. This alternative would minimally provide for the development and management of school lands in the Plan Area and most development on these lands would not be streamlined by the DRECP. Therefore the alternative would not meet the CSLC Objectives.

Rationale for Elimination. Because the Southeast Emphasis Alternative conflicted with the DRECP goals and with the purpose and need and objectives of one or more of the REAT agencies, the alternative did not advance for further analysis. This alternative was eliminated because it would not meet the interagency goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area. Additionally, it was eliminated because it would minimally meet the CSLC objective to provide for development and management of school lands. The majority of the school lands would not allow streamlined development by the DRECP.

The Southeast Emphasis Alternative poses feasibility issues. It would locate 19,000 MW of renewable energy between Imperial County and eastern Riverside County. This would require substantial amounts of new transmission in and around the Iron Mountains and south of Chocolate Mountains. It would likely face severe permitting and siting constraints for new lines from both eastern Riverside and Imperial County into the Coachella Valley and would likely require expansion of the BLM Energy Corridor from Eastern Riverside west through the Coachella Valley (DRECP 2012a).

The alternative would eliminate farming on productive agricultural lands, including Williamson Act –protected lands. The agriculture-dependent economy in the Imperial County area could be harmed. Agriculture in 2011 in the Imperial Valley generated an estimated \$1.175 billion in personal income, with an estimated total economic impact of \$5.3 billion (Imperial County Farm Bureau 2012). Farmlands also provide important habitat for certain species like the burrowing owl, and the Salton Sea, farm fields, and IID canals provide habitat for birds. Over 70% of California's burrowing owls reside in Imperial County (Imperial County Farm Bureau 2012).

II.8.2.8 Avian Avoidance Alternative

Alternative Description. A number of scoping comments requested consideration of an alternative that would avoid impacts to avian species. The comments requested an alternative that would revise the DRECP planning area to:

- Avoid impacts to eagles
- Exclude areas that overlap with California condor use areas
- Exclude areas that support high densities of wintering or migratory birds, contain a high level of raptor activity, or contain breeding, wintering, or migrating populations of less abundant species

There are about 600,000 acres of modeled suitable foraging habitat for the California condor in the DRECP Plan Area (Species Profiles 2012a). This habitat is located in the Sierra Nevada and Southern California Mountain and Valleys and includes scrub, grassland, woodland, and wetland habitats. The DRECP Plan Area has historical and current occurrence records of bald eagles and golden eagles and suitable foraging habitat for condors and eagles (Species Profiles 2012b, Species Profiles 2012c). Eagle and condor breeding habitat is concentrated along the Highway 395 corridor and along the Tehachapi Mountain Range (DRECP 2012c, DRECP 2012d, DRECP 2012e). Eagle breeding habitat is also modeled south of Barstow, east of Victorville, in Joshua Tree National Park, within the along the Colorado River, surrounding the Salton Sea, and in Inyo County near the California and Nevada border (DRECP 2012c, DRECP 2012d).

The Avian Avoidance Alternative would avoid the modeled avian foraging and breeding habitat but would not focus renewable energy facilities into areas most suited for development with the least conflicts with long-term conservation and management of other Covered Species.

Consistency with Purpose and Need and Objectives. The Avian Avoidance Alternative would partially meet the interagency goal of providing a streamlined process for the development of utility-scale renewable energy. It would partially meet the goal of providing for the long-term conservation and management of Covered Species and other physical, cultural, scenic and social values within the Plan Area. This is because it would avoid modeled foraging and breeding habitat for some avian species but would not provide for the long-term conservation and management of other Covered Species or physical, cultural, scenic and social values.

The Avian Avoidance Alternative would respond to the BLM's purpose and need for agency action in the EIR/EIS including the federal orders and mandates that compel the BLM to evaluate renewable energy projects on federally administered lands (see Volume

I, Section I.1.2). It would partially respond to the BLM's purpose to conserve biological values of the CDCA and identify and incorporate public lands managed for conservation purposes within the CDCA because it would not provide conservation for physical, cultural, social, and scenic values.

The alternative would only partially respond to the USFWS's purpose and need to provide a means whereby the ecosystems upon which federally protected species depend may be conserved and to provide a program for the conservation of such species, because important avian habitats would not be disturbed. However, this alternative would respond to USFWS's purpose and need to advance DOI's national policy goals to identify and prioritize specific locations best suited for large-scale production of solar energy on public lands and encourage the production, development, and delivery of renewable energy as one of the DOI's highest priorities.

The Avian Avoidance Alternative would only partially meet the objective of accommodating and minimizing the potential environmental impact of utility-scale renewable energy generation sufficient to accommodate foreseeable demand in Plan Area through 2040 because it would only minimize impacts to modeled foraging and breeding habitat for some avian species but would not provide for the long-term conservation and management of other Covered Species or physical, cultural, scenic and social values. It could meet the CEC, CDFW, and CSLC objectives to contribute to California's RPS and greenhouse gas reduction mandates and goals by planning for approximately 20,000 MW of renewable energy and transmission in the Plan Area. It would partially meet the objective of providing for the long-term conservation and management of Covered Species within the DRECP.

Rationale for Elimination. The Avian Avoidance Alternative was eliminated because it would only partially meet the purpose and need and objectives to streamline renewable energy and provide for long-term conservation and management of Covered Species. It would not concentrate renewable energy development in the defined DFAs and would potentially pose high biological resource conflicts for Covered Species other than avian species. The DFAs incorporated in the alternatives analyzed in the EIR/EIS avoid the high-concentration golden eagle nesting habitat near Barstow and the Cady and Bristol mountains. Portions of the Tehachapi Mountains within the Condor Study Area were identified with high-conflict potential with development and excluded from DFAs. The Condor Study Area includes 37,000 acres of very high-value California condor habitat and areas of historically frequent condor foraging and roosting activity within the Tehachapi Uplands Multiple Species Habitat Conservation Plan, which contributes to the condor's ongoing recovery.

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