

Supplemental Draft Programmatic Environmental Impact Statement for Solar Energy Development

Overview

In October 2011, the Bureau of Land Management (BLM) and the Department of Energy (DOE) issued a Supplement to the Draft Programmatic Environmental Impact Statement (PEIS) to provide more guidance on the solar energy zones (SEZs) as well as the process for developing solar energy facilities outside the zones, and further direct the development of utility-scale solar projects on BLM-managed lands for the next two decades.

On January 27, 2012, SEIA filed two sets of comments. The first was a joint filing with the Large-scale Solar Association (LSA). The second filing was a collaborative effort with LSA, several utility-scale solar developers and a variety of conservation organizations, which agreed on several issues and provided joint recommendations to BLM and DOE.

Pending Applications Should Be Approved Under Existing Policies

BLM must clarify that all pending applicationsⁱ will be evaluated under existing policies and will not be subject to the PEIS requirements that will apply to future applications. Applicants that have invested thousands of hours and hundreds of thousands of dollars siting and permitting their solar power plants must be able to rely on BLM's pending application policy.

The Variance Process for Solar Outside of Zones Must Be Clear and Flexible

SEIA and the conservation community are committed to work together to develop new zones so that use of the variance process is minimized. However, until the zones are adequate and a process for adopting new zones is in place, BLM must clarify the variance process for applications outside of the zones and be flexible when considering variance applications.

There Must Be a Clear and Expedited Process for Adopting New Zones

BLM must establish a clear and expedited process for nominating and establishing new zones because the Supplemental Draft PEIS does not provide sufficient development opportunities. Rather than increasing the number and size of zones in the Supplemental Draft PEIS, BLM reduced the already limited opportunities for development in the SEZs by over 50 percent (in terms of acres). Less than 225,000 acres are actually available for new projects within the SEZs; most SEZs can only support one or two utility-scale solar projects; and some of the SEZs are already full. BLM should host an "open season" for nominating and evaluating new zones after the Final PEIS is issued to ensure utility-scale solar's momentum continues.

BLM Should Coordinate with Transmission Planning Entities

To be useful for development, SEZs must have or be near transmission. Though the Supplemental Draft PEIS claims that 20 million acres of land are available for development, only 1.2 million acres are in California and near load and transmission. BLM should already be reviewing leading transmission proposals and coordinating with local, state and regional land-use and transmission efforts to facilitate cost-effective and environmentally sound transmission network upgrades and additions to SEZs.

ⁱ Pending applications are defined as those applications within the SEZs that were filed before June 30, 2009 and those applications that are outside of the SEZs that were filed before the Supplement to the Draft PEIS was published. Supplement to the Draft PEIS at p. 1-9.

About the Solar Energy Industries Association®

Established in 1974, the Solar Energy Industries Association is the national trade association of the U.S. solar energy industry. Through advocacy and education, SEIA® and its 1,100 member companies are building a strong solar industry to power America. As the voice of the industry, SEIA works to make solar a mainstream and significant energy source by expanding markets, removing market barriers, strengthening the industry and educating the public on the benefits of solar energy.

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