

Desert Renewable Energy Conservation Plan
Frequently Asked Questions for the *Description and Comparative Evaluation of Draft DRECP Alternatives*

January 9, 2013

Note: These questions and answers are based on current thinking of agency staff and managers working on development of the Desert Renewable Energy Conservation Plan (DRECP). The plan features and provisions described below are subject to change based on future decisions relating to the structure and content of both the Draft DRECP and Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and Final DRECP and EIR/EIS. The alternatives analyzed in the Draft DRECP, including the preferred alternative, may differ from the alternatives presented in the Description and Comparative Evaluation.

A. Purpose of the *Description and Comparative Evaluation*

1. What is the purpose of the Description and Comparative Evaluation?

The purpose of the *Description and Comparative Evaluation of Draft DRECP Alternatives* (abbreviated here as *Description and Comparative Evaluation*) is to inform the public about the current status of DRECP alternatives. Alternatives presented in the *Description and Comparative Evaluation* include a No Action alternative, six action alternatives potentially to be considered in detail in the DRECP, and nine alternatives considered but not currently intended to be carried forward for further analysis. Integrated renewable energy development scenarios, potential reserve designs, and potential Bureau of Land Management (BLM) land use plan amendments (LUPAs) are included for each of the alternatives to potentially be considered in detail in the Draft DRECP to provide a comprehensive picture of the DRECP alternatives. Preliminary analysis of the alternatives is included in the document for purposes of comparative evaluation. Members of the public are invited to provide input regarding the development scenarios, reserve designs, BLM LUPAs, as well as more specific aspects of the draft alternatives, such as the structure used to present information regarding natural communities and species. Members of the public are especially encouraged to provide input regarding the differences among the draft alternatives, highlighting any differences that seem especially important for purposes of distinguishing and comparing the alternatives.

2. How will input on the Description and Comparative Evaluation be used?

Input on the *Description and Comparative Evaluation* will be used to help select a full range of alternatives for consideration in the Draft DRECP and to help refine topics to be analyzed and the methods of analysis in the Draft DRECP and EIR/EIS.

3. How will the Description and Comparative Evaluation be used to select a preferred alternative for analysis?

The state and federal agencies that are jointly developing the DRECP (the Renewable Energy Action Team (REAT) agencies) will select a preferred alternative for analysis based on input from the public as a

result of review of the *Description and Comparative Evaluation* and additional information and analysis from the REAT agencies. Selection of a preferred alternative or proposed project is another step in the process leading to agency approval of the final DRECP, but the final approved plan might be different from the preferred alternative described in the Draft DRECP. The preferred alternative (which state agencies also refer to as the proposed project) as well as other alternatives will be analyzed in detail in the Draft DRECP and EIR/EIS.

B. Reserve Design

1. Is the DRECP intended to be a Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP)?

Yes, the DRECP is being designed as an HCP, NCCP, and BLM LUPA. The DRECP will include all the statutory and regulatory components of an HCP and NCCP, including a reserve that meets the permit issuance criteria for an incidental take permit and HCP under the federal Endangered Species Act and an NCCP under the Natural Community Conservation Planning Act.

2. Does the Description and Comparative Evaluation include a draft DRECP Reserve Design?

The *Description and Comparative Evaluation* includes the Plan-wide Biological Reserve Design Context, similar to those presented at the April and July 2012 stakeholder committee meetings and posted on the DRECP website, as well as alternative-specific Conservation Area Reserve Systems for each of the alternatives to be considered in detail in the DRECP. The Plan-wide Biological Reserve Design Context is the mapped, visual expression of the plan-wide biological goals and objectives (BGOs) completed to date. The alternative-specific Conservation Area Reserve Systems are draft reserve designs for each alternative and are derived from the Plan-wide Biological Reserve Design Context. The *Description and Comparative Evaluation* includes an initial conservation analysis of each alternative, including comparisons of the alternative-specific Conservation Area Reserve Systems to the Plan-wide Biological Reserve Design Context.

3. How was the Plan-wide Biological Reserve Design Context used to develop the DRECP Reserve Design in the draft alternatives?

The Plan-wide Biological Reserve Design Context provides the context against which alternative-specific Conservation Area Reserve Systems are assessed in the DRECP. Each alternative-specific Conservation Area Reserve System is quantitatively and qualitatively compared to the Plan-wide Biological Reserve Design Context so that the degree to which each alternative implements the Plan-wide Biological Reserve Design Context and the plan-wide biological goals and objectives can be assessed.

4. What do the areas colored blue, green, and white mean on the Plan-wide Biological Reserve Design Context map?

The blue areas are areas of high biological sensitivity within the Plan Area. Areas of high biological sensitivity are areas where biological resources are more sensitive to perturbation, where biological resources are concentrated, and/or where highly sensitive biological resources occur. The Plan-wide

Biological Reserve Design Context was designed to connect existing Conservation Areas with blue areas to capture high proportions of key resources including:

- Desert tortoise critical habitat and least-cost corridors between critical habitat units
- Bighorn sheep mountain and inter-mountain habitat
- Mohave ground squirrel conservation and recovery area
- Flat-tailed horned lizard habitat
- Habitat linkages (Desert Linkage Network)
- Major river corridors
- Environmental gradients (elevations, landforms, slopes)
- Sand dunes and source areas
- Sensitive natural communities.

Blue areas were mapped using a variety of tools, including GIS data, published literature, expert input, and Marxan reserve selection modeling. Using these key resources as the primary design inputs, the blue areas were iteratively refined to capture the range of landscape features, natural communities, and proposed Covered Species of the DRECP.

The green areas are where biological resources are moderately sensitive to perturbation or where moderately sensitive biological resources occur. The moderate biological sensitivity (green) areas were mapped using the same tools that were used to map high biological sensitivity areas. Green areas were designed to connect and buffer existing Conservation Areas and blue areas and do contain important biological resources; however, these resources are not as concentrated as in blue areas or are subject to higher intensity existing land uses.

White areas are undesignated in the Plan-wide Biological Reserve Design Context, which means they have a low biological sensitivity or their biological sensitivity has not been mapped. Undesignated (white) areas may contain sensitive biological resources that would be addressed through Conservation and Management Actions.

5. Will it be necessary to conserve all blue and green lands within the Plan-wide Biological Reserve Design Context maps to meet the BGOs of the DRECP?

The Plan-wide Biological Reserve Design Context maps are the basis of the alternative-specific Conservation Area Reserve Systems. It will not be necessary to conserve all blue and green lands within each alternative-specific reserve system to meet DRECP BGOs. The completed DRECP reserve system will include Conservation and Management Actions that will explain in more detail what must be done to

meet DRECP BGOs within the Plan-wide Biological Reserve Design Context, and what resources will require special protections, management actions, or conservation measures.

6. Will the DRECP prohibit the development of renewable energy projects in blue and green areas?

Permit streamlining under the DRECP will be available only for covered transmission projects in areas outside of Development Focus Areas (DFAs), regardless of how such areas are designated in the completed DRECP reserve system. For all other renewable energy projects, permit streamlining will be available only within DFAs. However, the DRECP will not prohibit all development outside the DFAs. Projects on private land outside of DFAs and subject to local government jurisdiction would continue to be addressed through existing local, state, and federal permit processes. Management of renewable energy project proposals and other land uses on BLM lands outside of DFAs would be governed by the requirements of the LUPA.

7. Will the DRECP Reserve Design make it clear where renewable energy development would conflict with the DRECP and where renewable energy projects could potentially be developed under certain conditions without conflicting with the DRECP?

As explained above, the DRECP will only cover and provide permit streamlining for renewable energy generation projects within DFAs. The DRECP will also cover transmission projects outside of DFAs. The DRECP reserve system, when completed, will identify what geographical areas, natural communities, species, and other sensitive resources must be protected to achieve the DRECP's BGOs. Projects and activities that would prevent the DRECP from meeting its BGOs would be inconsistent with the DRECP. However, the DRECP will neither prohibit all renewable energy generation projects outside of DFAs nor include specific criteria or conditions of approval for renewable energy generation projects outside of DFAs. Management of renewable energy project proposals and other land uses on BLM lands outside of DFAs would be governed by the requirements of the LUPA.

Renewable energy development is currently prohibited within Legally and Legislatively Protected Areas (LLPAs), which will be included in the DRECP reserve system. LLPAs include State Parks, National Parks, BLM Wilderness Areas, etc., and are described in detail in Appendix H of the *Description and Comparative Evaluation*, and as seen previously in October 2011, and April and July 2012. The LLPAs are mapped ownership areas with existing statutory and legal requirements and management regimes in place and are not a result of the DRECP planning process.

8. What role will the designation of National Landscape Conservation System (NLCS) and Area of Critical Environmental Concern (ACEC) designations play in the Reserve Design?

The NLCS and ACEC designations under the BLM LUPA would be considered conserved and the conservation and management actions proposed for these areas would take effect immediately upon issuance of the record of decision (ROD) for the BLM LUPA. Appendix D of the *Description and*

Comparative Evaluation provides supporting documentation for these designations by Alternative. Appendices D, E, and H of the *Description and Comparative Evaluation* describe the management that would occur on these lands.

C. Biological Goals and Objectives (BGOs)

1. What are the remaining steps to complete the BGOs?

The first remaining step in completing the BGOs is to finalize the covered species and natural community lists. The originally proposed covered species list is being assessed to ensure that the list includes species that warrant coverage and excludes species that do not. Finer-scale designation, mapping, and delineation of natural communities are also being conducted. This effort is nearing completion. The BGOs for the covered species and natural communities are interdependent, and additional BGOs will need to be developed for any species and natural communities added to these lists. Once the covered species list and natural community mapping effort are complete, the species and natural community BGOs can be merged with the landscape BGOs. In turn, a last step may include revision of the landscape BGOs.

2. How are BGOs being used during the development of the DRECP?

The BGOs are the guiding principles for the DRECP Conservation Strategy and are expressed at the landscape, community, and species levels. Landscape level goals address ecosystem processes and functions, community level goals address the conservation of natural communities, and species level goals address conservation at the species level. Habitat and species modeling are being used to develop and refine conservation acreage objectives. Current scientific literature and expert opinion were then used to reassess the acreage objectives and develop plan-wide BGOs. The BGOs are being used to guide the development of habitat and species specific-conservation measures for inclusion in the DRECP Conservation Strategy. They have been used to set the initial acreage targets employed in the Marxan reserve selection modeling as a step toward development of the Plan-wide Biological Reserve Design Context and alternative-specific Conservation Area Reserve Systems under consideration. The BGOs have informed and continue to inform proposals as to what conservation measures are to be implemented under the DRECP to help achieve the BGOs.

D. Mitigation

1. What role will project mitigation play in implementing the DRECP Reserve Design? Is the DRECP Reserve Design intended to mitigate project impacts?

To meet state and federal legal standards, the reserve is being designed to provide for the long-term conservation of ecosystem function, the natural communities, and species that are covered by the DRECP. For most communities and species, the reserve area required to accomplish this will likely be greater than the amount of compensatory mitigation that will be required for impacts resulting from covered activities. Mitigation for covered activities can be an important tool for creating the DRECP reserve system, but it will not be the only tool. For covered activities that require compensatory mitigation, mitigation would be provided within the reserve design and would be proportional to each

project's impacts. Other tools, such as the BLM LUPA, and other funding sources would also be used to complete the reserve system.

2. Will BLM lands be used to provide compensatory mitigation for the impacts of covered renewable energy projects under the DRECP?

As stated in the Memorandum of Understanding between the BLM and the California Department of Fish and Game (CDFG) signed November 27, 2012:

In many cases, CDFG and the BLM anticipate that impacts from renewable energy projects located on privately owned land or state-owned land will be mitigated on privately owned land or state-owned land. However, BLM may agree to authorize mitigation on BLM Lands for impacts caused by development on privately owned land or state-owned land on BLM Lands.

3. How will BLM lands used for mitigation purposes be protected from incompatible uses under the DRECP?

The DRECP (see Appendix D of the *Description and Comparative Evaluation*), through the planning and National Environmental Policy Act (NEPA) process, will analyze compatible and incompatible uses in DFA and alternative-specific Conservation Area Reserve Systems. In the Memorandum of Understanding between the BLM and the CDFG signed November 27, 2012, section 3. Projects Proposed on Mitigation Lands describes a process for addressing future project proposals on public lands received for mitigation.

4. What role will the retirement of grazing allotments on BLM lands have in the DRECP?

The BLM has finalized a written policy dated December 21, 2012, CA-2013-006, in accordance with the Consolidated Appropriations Act of 2012 (Public Law 112-74) to outline the process under which the donation of certain existing permits or leases could occur. Public Law 112-74 directs the Secretary of the Interior, upon receiving the donation of any valid existing grazing permits or leases, to “terminate the grazing permit or lease, ensure a permanent end . . . to grazing on the land covered by the permit or lease” and then allocates “the forage to wildlife use.”

In the Memorandum of Understanding between the BLM and the CDFG signed November 27, 2012, agreement was reached in that “acceptance of the relinquishment of grazing permits or leases to make the land available for mitigation by allocating the forage to wildlife use” is a valid form of compensatory mitigation.

E. Renewable Energy Development

1. How will pending projects—projects for which an application has already been submitted to one or more REAT agencies—be addressed in the DRECP?

Projects with pending applications will continue to be processed through the existing permitting processes of the respective permitting agency or agencies. If projects are located within biologically sensitive areas that have been identified in the DRECP planning process, the project may undergo an

interim process review to evaluate the potential effect of the project on the DRECP. The results of this review would be evaluated in the normal agency permitting process, and may result in mitigation measures that are recommended to lessen any identified potential impacts to the DRECP. The interim process is identified in the DRECP Planning Agreement and is outlined in Appendix I of the *Description and Comparative Evaluation*. Appendix I also explains the proposed approach for pending projects after the final DRECP is approved.

2. *How will the DRECP EIR/EIS treat the environmental impacts of pending projects?*

Pending projects within the DRECP planning area (both renewable energy projects and any other type of development project) that have active applications filed with a permitting agency will be identified and are considered “reasonably foreseeable,” indicating that they are likely to be developed at some point in the future. These projects will be analyzed for potential cumulative impact as required by NEPA and/or the California Environmental Quality Act (CEQA). These projects will be listed and analyzed in the Draft DRECP.

3. *How will existing renewable energy projects be taken into consideration in the DRECP “No Action Alternative”?*

All renewable energy projects that have come online since the initiation of the DRECP planning process, all projects under construction, and all approved projects on BLM lands will be treated as existing projects that are generating megawatts (MW) at their planned capacities in the No Action Alternative.

4. *How will DRECP estimates of demand for large-scale renewable energy development in the Plan Area take account of pending and existing projects?*

The California Energy Commission is tracking renewable energy projects statewide, including those approved by BLM and by local agency jurisdictions. Using the best available information for these projects, the Draft DRECP and EIR/EIS will take into consideration the MW of generation that is/will be provided by projects that have come online, are under construction, or have been approved on BLM land since the DRECP planning process was initiated. These new MW of generation will be counted toward achieving the DRECP planning goal for 2040. About 1,500 MW of new generation have been identified to date and this amount is reflected in the analysis presented in the *Description and Comparative Evaluation*. The MW of new generation will continue to be tracked and counted toward achieving the planning goal. While this accounting will not change the DRECP planning goals and assumptions, progress toward the goal will be considered in agency permitting decisions for the DRECP.

5. *Will the DRECP cover the impacts of wind and solar projects on golden eagles or California condors?*

The REAT agencies intend to include these species as DRECP covered species. The considerations for the approach to permitting golden eagle take are presented in Appendix K of the *Description and Comparative Evaluation*. Based on best available information for the California condor, it is anticipated that no lethal take would be authorized for condor, but that the DRECP would promote conservation of the species.

6. *Was the renewable energy siting tool developed by the Environmental Protection Agency (EPA) as part of its “RE-Powering America’s Lands Initiative” used to develop the draft DRECP alternatives?*

REAT agency representatives met with the EPA in the early stages of development of the data used in the siting tool and the California Energy Commission participated actively in the development of the siting tool. The REAT agencies considered the locations of the various categories of EPA sites as one factor in the formulation of the DFAs. Not all of the EPA identified sites are located within DFAs. Now that the siting tool is complete, DRECP planners will evaluate the EPA priority, renewable resource information, and EPA identified acreages to ensure maximum consideration of those high-priority sites that occur within DFAs.

7. *How is transmission being addressed in the DRECP?*

Transmission is a covered activity within the DRECP Plan Area inside and outside DFAs. Transmission would not be covered by the DRECP outside the Plan Area. Transmission needs for each alternative are described in the *Description and Comparative Evaluation*. The disturbance estimates for potential new transmission required to deliver generation from the DFAs to load centers, as summarized in the Transmission Technical Group (TTG) report (included as Appendix A of the *Description and Comparative Evaluation*), will be analyzed in the Draft DRECP.

F. BLM Solar Programmatic Environmental Impact Statement (PEIS)

1. *How does the DRECP relate to the Department of Interior BLM Solar PEIS?*

The Solar PEIS Record of Decision (October 12, 2012) amended the applicable BLM land use plans, which are included in the “no action” alternative for the DRECP. The Solar PEIS only addressed solar energy projects and was programmatic in nature, spanning six western states. The DRECP is also being designed to include an amendment to the BLM land use plans in the California desert area and includes solar, wind, geothermal, transmission, conservation, recreation, etc. When approved with a Record of Decision, the DRECP will amend the land use plans that were amended by the Solar PEIS. The Memorandum of Understanding between the Department of the Interior and the State of California on Renewable Energy signed January 13, 2012, states “that DRECP work products available during the development of the Solar PEIS are informing the Solar PEIS and that Solar PEIS work products available during the development of the DRECP are informing the DRECP.” In this agreement, the signatories “Also place a high priority on processing applications for solar development in any areas ultimately identified as solar energy zones through the Solar Energy Programmatic Environmental Impact Statement (Solar PEIS) and renewable energy zones identified in the DRECP.”

2. *How will the DRECP affect lands made potentially available for utility-scale solar development in the Solar PEIS?*

All seven alternatives being considered within the DRECP preserve the Imperial East Solar Energy Zone (SEZ) in its entirety as a DFA. Four alternatives (Alternatives 2, 5, 6, and 7) retain the Riverside East SEZ in its entirety as a DFA. Alternatives 1, 3, and 4 retain portions of Riverside East as a DFA, with other

portions designated as conservation lands (Executive Summary, *Description and Comparative Evaluation*, December 17, 2012).

3. How will “variance lands” in the Solar PEIS be treated in the DRECP?

Three alternatives depict variance lands as per the Solar PEIS—Alternative 1 (Disturbed Lands/Low Resource Conflict), Alternative 6 (Geographically Balanced/Transmission Aligned Alternative C with BLM Variance Lands), and Alternative 7 (No Action). For Alternative 1, Solar PEIS variance lands inside DFAs become DFA lands. The variance lands outside DFAs are screened using resource criteria, consistent with that expected to be applied at a region or project area basis under the Solar PEIS and screened out variance lands are not considered to be available for renewable energy development. For Alternative 6, Solar PEIS variance lands do not occur within DFAs and remain variance lands as per the Solar PEIS. For Alternative 7, variance lands are identical to those in the Solar PEIS and remain variance lands as per the Solar PEIS; since there are no DFAs in Alternative 7, location of variance lands within DFAs is not a factor in this alternative. Variance lands would not be available for inclusion in DRECP Conservation Area Reserve Systems under these alternatives.

4. When or to which renewable energy projects will the Solar PEIS apply, and when or to which projects will the DRECP apply?

The Solar PEIS amended the BLM land use plans in October 2012 with its Record of Decision. All utility-scale solar projects on BLM-administered lands are subject to the most recent land use plans.

5. If a DFA includes all or a portion of a Solar PEIS SEZ, what happens to the SEZ?

Refer to F.3 and F.4 above.

6. How will pending wind applications (which were not covered by the Solar PEIS) be treated?

Wind energy projects were not considered in the Solar PEIS. They will, however, be analyzed within the DRECP. Current applications for wind projects will continue to be processed under the most current land use plans, rules, regulations, and policies.

G. Effect of the DRECP on other projects and land uses

1. How will the DRECP affect permitting for projects and activities that are not covered by the DRECP for (a) BLM lands and (b) private lands?

- a. On BLM-administered lands, the DRECP is proposed to amend BLM’s applicable land use plans, which apply to a range of activities including but not limited to renewable energy development. All discretionary projects on BLM land are subject to the applicable land use plan and NEPA. On all other public lands, the DRECP will apply only to renewable energy generation projects within DFAs, transmission projects, and conservation activities that are specifically covered by the DRECP.

- b. The DRECP does not apply to permitting for projects and activities on private lands that are not covered by the DRECP. The DRECP applies only to covered renewable energy generation and transmission projects and covered conservation actions when those projects are subject to the jurisdiction of an agency that has received a permit under the DRECP. DFAs in the draft alternatives define areas on private land within which permitting for covered renewable energy projects would be streamlined. Alternative-specific Conservation Area Reserve Systems define areas on private land where covered renewable energy projects would not be streamlined. They would, however, contribute to meeting the BGOs described in the DRECP. The DRECP itself would not impose restrictions on non-covered projects and activities on private lands. However, local governments that choose to participate in the implementation of the DRECP may impose restrictions on non-covered projects and activities on private lands using their local land use authority.

H. Involvement of Local Government

1. How are local governments involved in the development of the DRECP?

Counties within the Plan Area are actively participating in the development of the DRECP; however, at this time, no counties have proposed to apply for permits under the federal Endangered Species Act or the California Natural Community Conservation Planning Act. The REAT agencies have been meeting regularly with each county to provide updates, share draft documents, discuss issues of interest to each county, and receive county input. The meetings focus on ways to ensure that the DRECP is compatible with relevant county policies and interests and how the counties might apply existing policies, plans, or ordinances in ways that would complement the DRECP or even develop new complementary policies, plans, or ordinances.

2. How will local governments participate in the implementation of the DRECP?

The counties within the Plan Area have expressed an interest in cooperating with the REAT agencies in the implementation of the DRECP if the final DRECP is compatible with relevant county policies and interests. The Governor has included \$7 million in the State budget for purposes of making grants to counties in the DRECP Plan Area and San Joaquin Valley in accordance with section 25619 of the Public Resources Code. These Energy Commission grants could be used by counties to develop or revise rules and policies, such as general plan elements, zoning ordinances, and NCCPs that facilitate the development of eligible renewable energy resources and their associated electric transmission facilities in ways that help to implement or that complement the DRECP.

3. Will counties or other local governments be able to join the DRECP and participate in its implementation after it is finalized?

The DRECP is being designed so that counties and cities within the DRECP Plan Area can choose to participate in the implementation of the DRECP even after the DRECP is finalized. Counties and cities will be able to participate in various ways. One way will be for the local agency to develop a detailed conservation plan for lands within its jurisdiction that is based on, or “tiers” from, the DRECP. This would

give each local government a degree of flexibility to tailor implementation of the DRECP on non-federal lands to fit its needs. Based on the DRECP and the detailed, local, conservation plan, the county or city could obtain permits under the federal Endangered Species Act and the California Natural Community Conservation Planning Act and could assume control of and responsibility for implementation of the DRECP on non-federal lands within its jurisdiction. Counties and cities could also choose to participate in the implementation of the DRECP in other ways, such as by adopting rules or policies (e.g., general plan elements or zoning ordinances) that complement the DRECP.

4. How will the DRECP be affected if one or more counties in the DRECP Plan Area choose not to participate in DRECP implementation?

The REAT agencies strongly seek and support local government participation in the implementation of the DRECP and believe it will strengthen the DRECP and increase its success and effectiveness. However, the DRECP can be finalized and implemented without formal local government participation.

Depending on the county or city, the consequences of non-participation for the DRECP would vary. In areas where a large amount of renewable energy development is likely to occur on private land, or where the conservation of private land is important to achieve the DRECP's BGOs, local government participation is especially important and valuable. In areas where development and conservation activities are concentrated on federal or state land, local government participation is less important. However, even in such areas, the REAT agencies strongly seek and support local government participation based on their belief that the DRECP will achieve the greatest benefit where federal, state, and local policies and rules regarding renewable energy and natural resources conservation are aligned.

I. Incorporation of New Scientific Data and Analysis

1. How will the recommendations from the Independent Science Advisors (ISA 2010) and the Independent Science Panel (ISP 2012) be addressed or incorporated in the DRECP?

The REAT agencies are carefully considering the recommendations made by both the ISA 2010 and ISP 2012. Many of the recommendations have been incorporated into the planning process and analysis and are reflected in the *Description and Comparative Evaluation*. Incorporation of recommendations from the more recent ISP 2012 recommendations is ongoing and will be further addressed where feasible and appropriate. Some ISA/ISP recommendations apply to the implementation of the DRECP and will be incorporated or addressed during the implementation of the DRECP in monitoring and adaptive management and other areas.

2. What additional scientific data and analysis will be incorporated in the DRECP, other than what is included in the Description and Comparative Evaluation?

Additional scientific data and analyses that address ISA and ISP recommendations are continually being incorporated into the DRECP planning effort, including:

- New vegetation mapping data
- Updated natural communities

- Updated species occurrence data
- Revised species habitat models
- New scientific literature and studies
- Climate change analysis.

J. Amendment of the DRECP

1. *How could the DRECP be amended after it is finalized if needed to address new biological information, changes in renewable energy technology, increases in the demand for renewable energy, or other new developments?*

The DRECP will consist of a BLM LUPA, an HCP, and an NCCP, all of which can be amended under existing laws, regulations, and policies. The regulations regarding amendments for LUPAs can be found at 43 CFR 1610. The regulations regarding HCP amendments can be found at 50 CFR 13.23. There are no regulations for NCCP amendments, but they are handled similarly to HCP amendments. If warranted by new biological information, changes in renewable energy technology, or increases in demand for renewable energy, etc., the DRECP can be amended accordingly.

Because of ongoing efforts by several agencies and institutions to gather and analyze scientific information regarding natural resources within the DRECP's extraordinarily large Plan Area, the rapid advances in renewable energy technology, and uncertainty about the precise level of future demand for renewable energy, an amendment to the DRECP could be warranted during its approximately 25-year term.

2. *How could additional areas in the DRECP plan area be added for renewable energy development after the DRECP is finalized?*

New renewable energy development areas, i.e. additional areas within which covered renewable energy projects would be streamlined, could be added to the DRECP through an amendment (see answer to question J.1.). For example, if changes in wind turbine technology further reduce or eliminate impacts to avian species, or measures to avoid take of avian species are developed, the DRECP could be amended to include appropriate new areas within which permitting for wind energy projects could be streamlined. Because additional development areas would expand the geographic scope of the renewable energy projects covered by the DRECP and could have effects on other resources, an amendment would be required and additional analysis under CEQA and NEPA would likely be required.

K. Public Input

1. *What additional opportunities will members of the public have to provide input on the DRECP?*

Public input can be provided at any time as part of the DRECP EIR/EIS process. Scoping has been completed and a scoping report prepared. The release of the *Description and Comparative Evaluation* is

a continuation of the informal process of input prior to the release of the formal Draft DRECP and EIS/EIR. Public input on the *Description and Comparative Evaluation* can be provided at any time. However, the REAT agencies request your input by January 23, 2013 so that they have the greatest opportunity to consider it as they develop the proposed alternatives, preferred alternative, and their approach to analyzing the environmental effects for the Draft DRECP and EIS/EIR.

An opportunity for formal public comment will be provided with release of the Draft DRECP and EIR/EIS. Formal comments on the Draft DRECP and EIR/EIS will be solicited for 90 days.

In addition, the California Energy Commission, in cooperation with other REAT agencies, intends to sponsor two more public workshops related to the DRECP: one on the role of private lands in the DRECP and one on monitoring and adaptive management. As plans for these workshops progress, notices for these meetings will be posted to the DRECP website and sent to the DRECP listserv.