

Western Renewable Energy Zones Initiative

Consideration of Military Activities When Identifying Qualified Resource Areas (Proposal from the Department of Defense)

Military Lands

It is recommended that military lands, both “Fee Owned” and “Withdrawn,” be treated as exclusion areas. This determination is based upon two differing criteria:

- 1) A provision contained within legislation that Withdrawn Lands for “military purposes” raise statutory concerns that unless specifically identified as permissible, (e.g. geothermal energy production on Naval Air Weapons Station China Lake) development of utility scale renewable energy resources are not clearly within Congressional intent of “military purposes.”
- 2) The potential to develop utility scale renewable resources on military installations “fee owned” by the Department of Defense would require a local installation to determine compatibility, which is a project level analysis not intended as part of the process undertaken to identify Qualified Resource Areas.

Military Activity Areas

At this time, and particularly at the level of analysis for identification of Qualified Resource Areas, blanket exclusion based solely upon QRAs that are below identified military airspace, within known military radar footprints, or near other military activity areas does not seem reasonable. These areas are identified as overlay layers that require coordination with the military if, and when, renewable energy development is contemplated at the project level. As an example, we suggest review of the Nevada Renewable Energy Transmission Access Advisory Committee Phase I Report, Figure 3 (http://gov.nv.gov/RETAAC-I/FinalReport/RETAAC-Figure3_Final.pdf).

A determination not to preemptively exclude these areas is based in part on the assumption that only 25% of total potential wind resource will be developed within the QRA and only 3.5% of the total potential solar resource will be developed. Thus, we believe that accommodation of military mission restrictions can be handled on a case-by-case basis within the wind and solar discounts.

It is emphasized that the lack of exclusion does not imply approval of any renewable energy development that may affect the military mission or acknowledgement that any particular proposed renewable energy development will not have an impact on a particular military activity. The military will work with project proponents and other stakeholders to find areas that are compatible with the military mission. However, it is likely that some projects will be incompatible and the military will object.

All project proponents are encouraged to contact the military at the earliest practical stage in their project process. Contacts can be identified through use of the Federal Aviation Administration’s Obstruction Evaluation /Airport Airspace Analysis (OE/AAA) DoD Preliminary Screening Tool webpage at <https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showLongRangeRadarToolForm>.