



Roosevelt
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climate
+ community
project

A Progressive Take on Permitting Reform: Principles and Policies to Unleash a Faster, More Equitable Green Transition



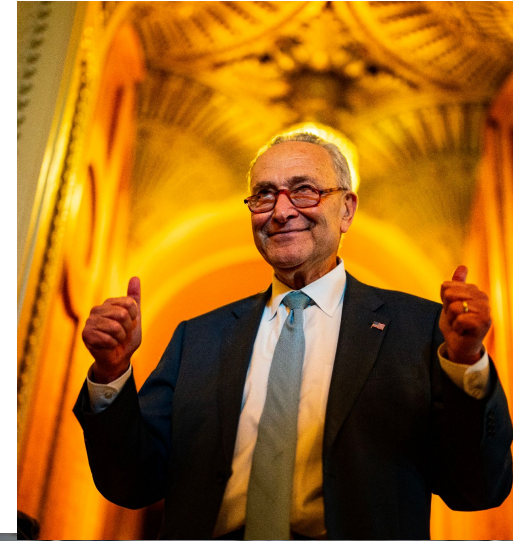
Why are we talking about permitting right now?

The New York Times

OPINION
EZRA KLEIN

What America Needs Is a Liberalism That Builds

May 29, 2022



What is lumped into the “permitting reform” conversation?

(and is it really about permits)

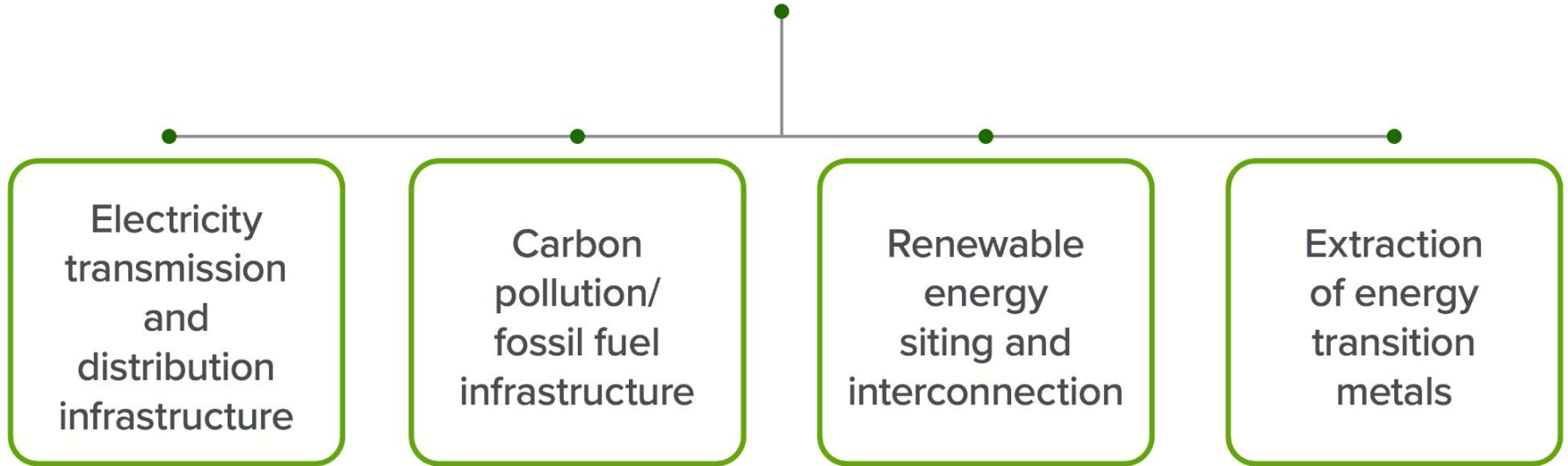
Breaking down the categories of approvals for energy projects.

National Environmental Policy Act analysis	<p>Reviews of relevant environmental and natural resource laws. Project impacts are assessed by expected significance through three categories of analysis.</p> <ul style="list-style-type: none">• Categorical exclusions• Environmental assessments• Environmental impact statements
Local and state zoning, permits, and approvals	<ul style="list-style-type: none">• Building or electrical code inspections• Zoning changes• General plan amendments• Transportation safety permits
Contracts or arrangements between private organizations	<ul style="list-style-type: none">• Interconnection agreements between electric utility and renewable energy developers• Cost allocation agreements for building or upgrading transmission
Operation and construction permits	<ul style="list-style-type: none">• Pollution discharge permits• Air emissions operating permits• Hydropower licenses• Discharge of dredged or fill materials

Different kinds of infrastructures face different obstacles

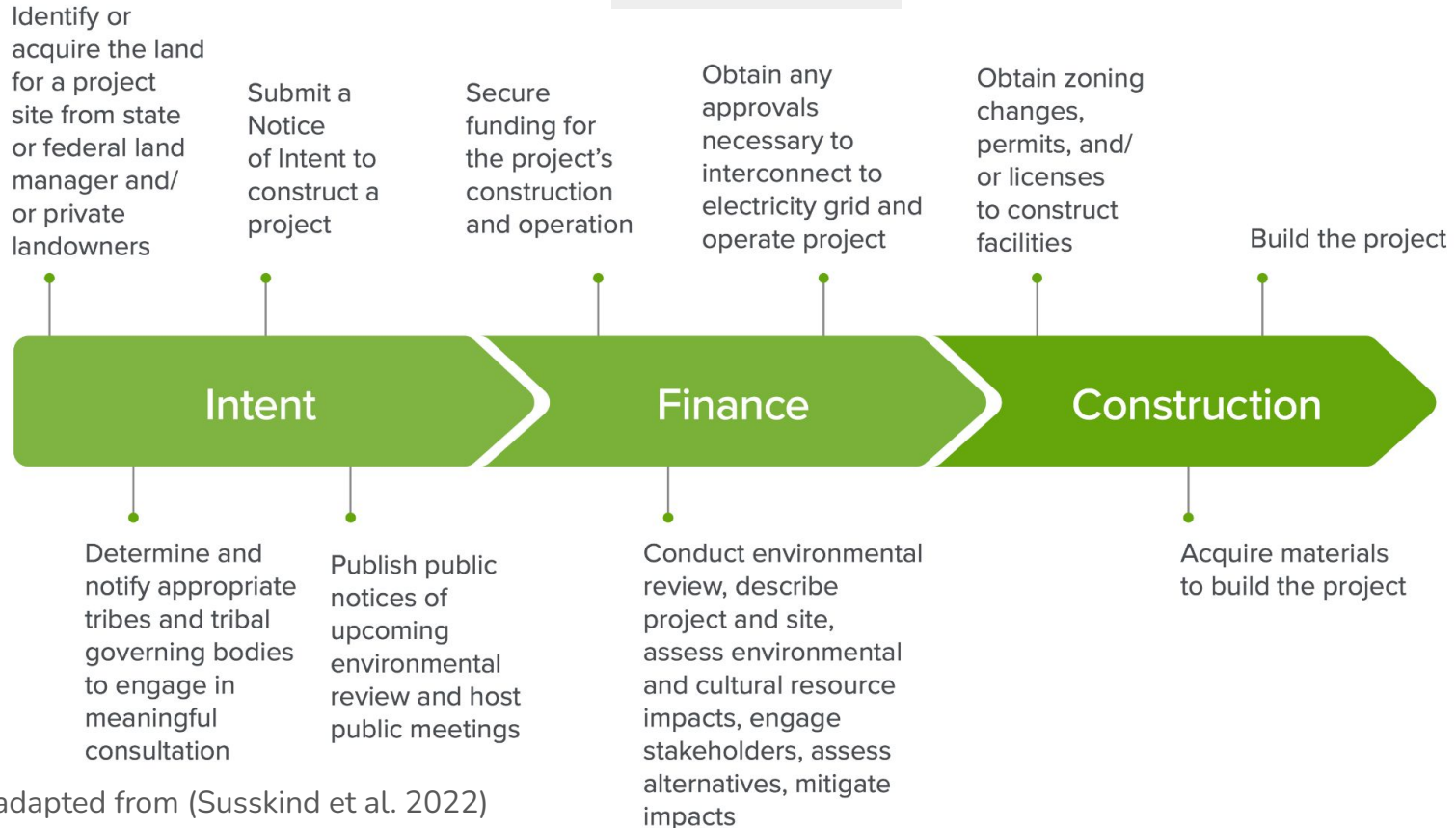
(some related to permitting, others not)

What issues do discussions on permitting reform include?



Where are projects getting slowed down?

New energy projects are typically not slowed by environmental review, but other factors.



Case Study:
**Desert Renewable
Energy Conservation
Plan**

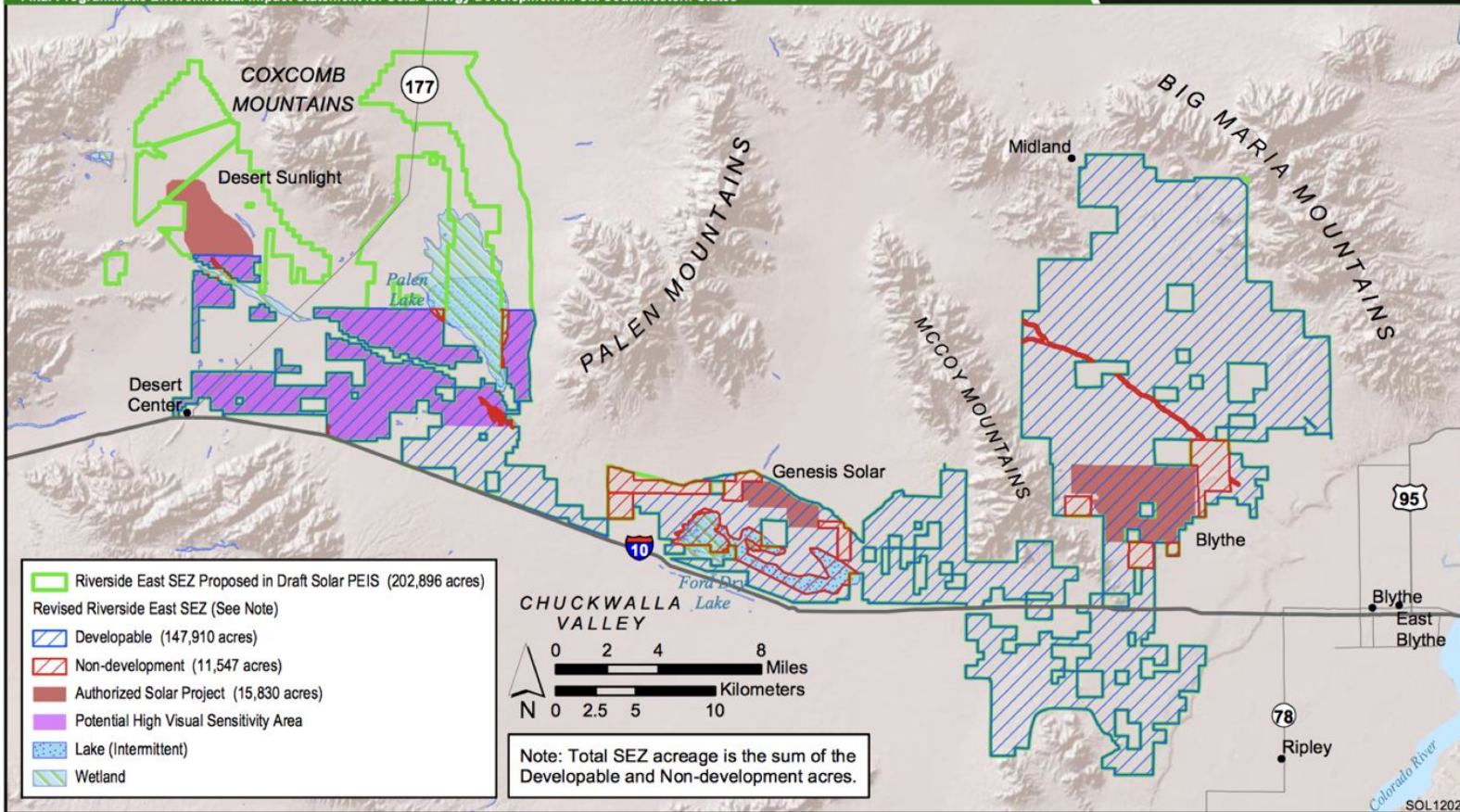


Developable Area for the Proposed Riverside East SEZ

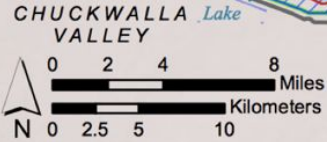
Map Prepared July 2012



Property of the U.S. Departments of Energy and the Interior for use in preparation of their Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States



- Riverside East SEZ Proposed in Draft Solar PEIS (202,896 acres)
- Revised Riverside East SEZ (See Note)
- Developable (147,910 acres)
- Non-development (11,547 acres)
- Authorized Solar Project (15,830 acres)
- Potential High Visual Sensitivity Area
- Lake (Intermittent)
- Wetland



Note: Total SEZ acreage is the sum of the Developable and Non-development acres.

The permitting reform conversation lacks clarity.

How do we shift the conversation to the forces that actually slow energy transition?

- Align actions with 1.5 degree targets.

Current proposals for permitting reform require us to take “the bad with the good” and accept some fossil fuels if we can get renewables. We say that changes should align with the Paris Climate Goals.

- Make environmental laws stronger.

The transition will have impact on the environment, especially with increasing storms and droughts. We say that changes should consider long term impacts of new infrastructure.

- Design with communities in mind.

Some permitting reform advocates think communities get in the way. But even without fossil fuel pollution, there are still community impacts. We say the new energy system should be reparative and make up for past harms.

Policies to Initiate the Green Transition

Enable more coordination and planning

- Utilize long-range land-use planning
- Increase transparency and accountability for transmission interconnection
- Increase capacity of permitting agencies
- Increase material and energy efficiency
- Support distributed energy resources
- Update the 1872 General Mining Act



Policies to Initiate the Green Transition

Enhance community participation and consent.

- Strengthen the National Environmental Policy Act (NEPA) and other bedrock environmental laws
- Respect tribal sovereignty
- Apply cumulative impact analysis
- Provide community benefit



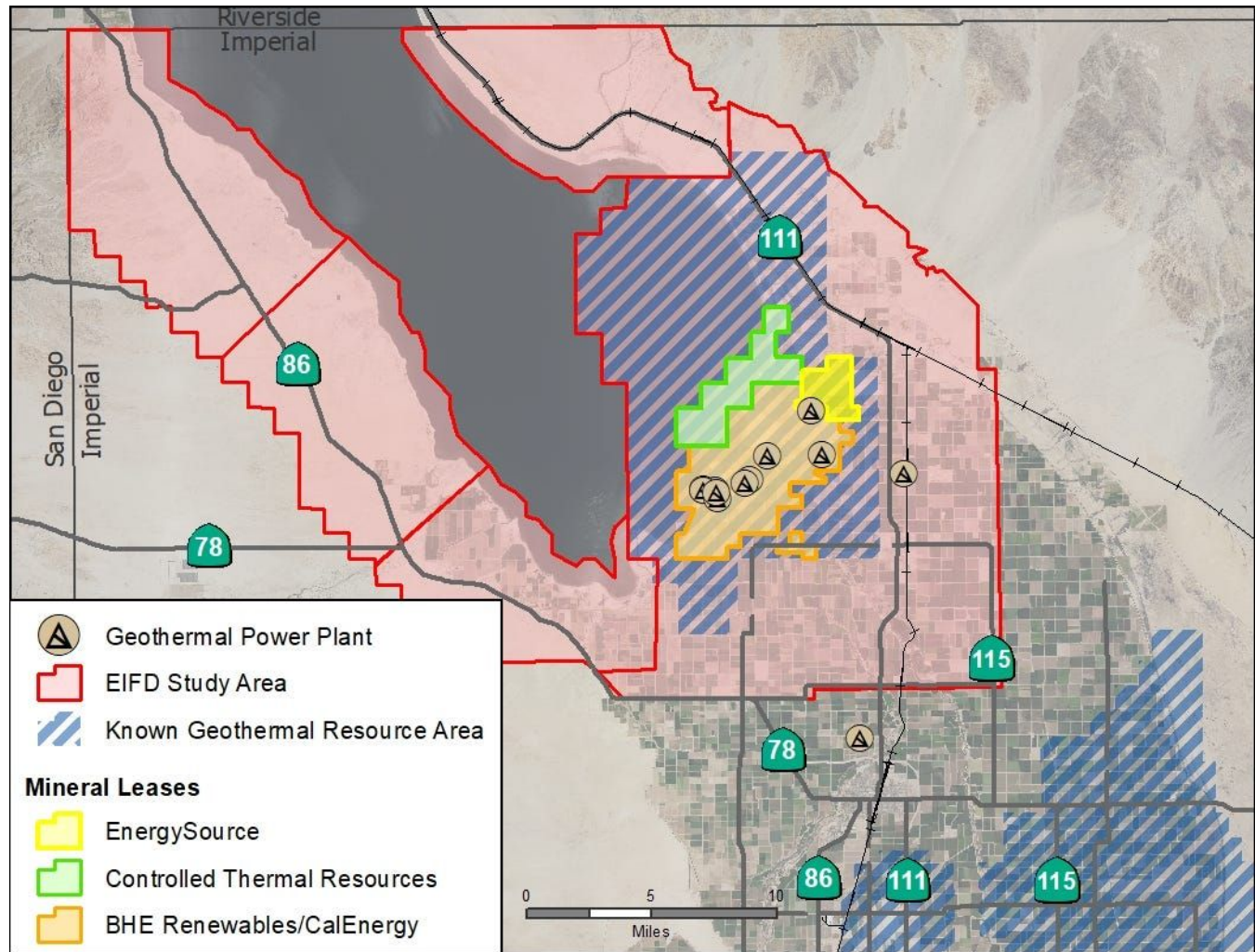
Policies to Initiate the Green Transition

Empower the Transition.

- Stop all new fossil fuel permits
- Protect communities from fossil fuel pollution
- Set emission reduction targets



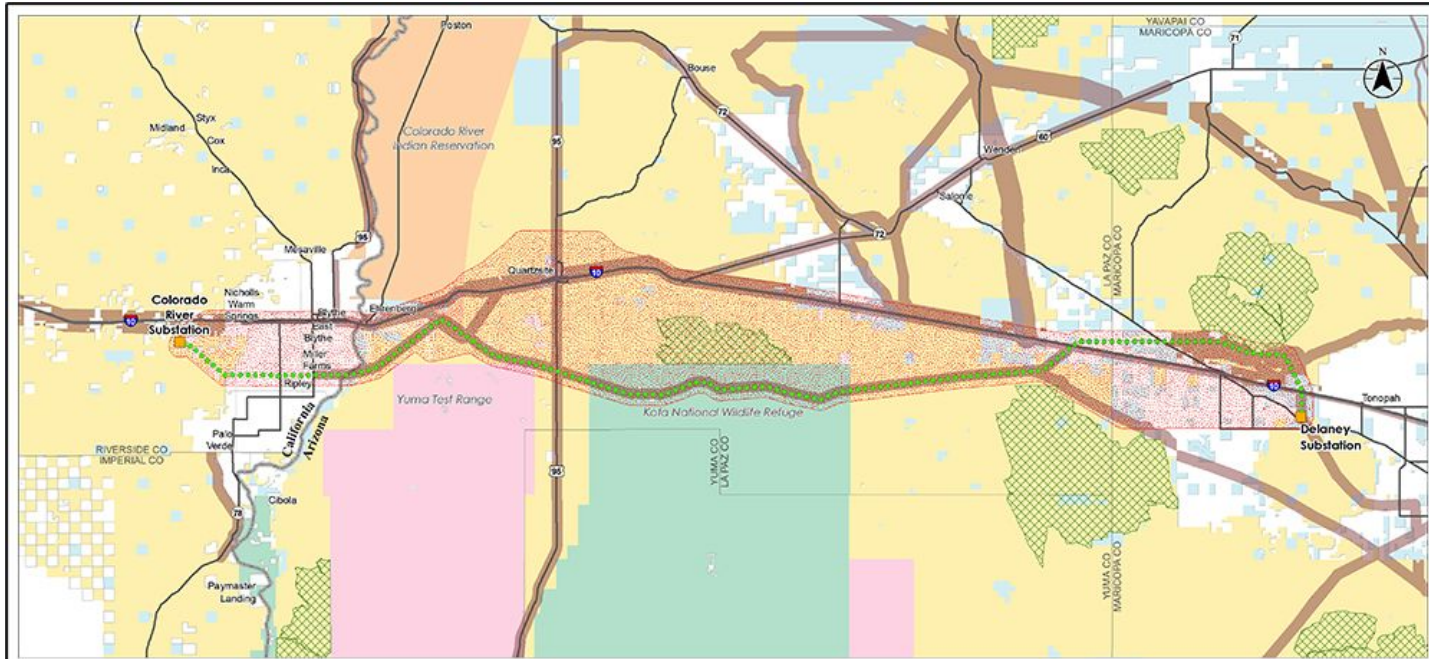
Case Study: Lithium Valley Commission



Case Study:
Willow Project



Case Study: Ten West Link



- | | |
|---------------------------|--------------|
| Substation | Indian Lands |
| Proposed Route | Military |
| Study Area | Private |
| Utility Corridor | State |
| BLM Wilderness Area | USFWS |
| Land Status | |
| Bureau of Land Management | |
| Bureau of Reclamation | |
| Local or State Parks | |



Ten West Link Proposed Action