

# **Policy for Siting of Renewable Energy, Transmission, Storage, and Related Infrastructure**

## **I. Introduction**

This Sierra Club policy establishes core principles and a decision-making process relating to siting of renewable energy projects, transmission, energy storage, and related infrastructure and land use policies. Consistent with the Board's 2030 Strategic Framework (Sierra Club 2022), it recognizes that a transformative expansion of renewable energy is necessary to meet Sierra Club's strategic priorities for climate action and ending our reliance on fossil fuel, including achieving 80% carbon pollution-free electricity by 2030 and achieving net zero emissions economy-wide by 2050. Siting renewable energy, storage, and transmission must be accomplished in concert with other, equally important, priorities in Sierra Club's Strategic Framework, most notably our commitments: 1) to protect 30% of lands and waters in the United States by 2030 to address the extinction and climate crises, and 2) to ensure equitable treatment for all people. The Sierra Club's strategic priorities are based on the understanding that the climate, extinction, and equity crises are existential threats to the survival and well-being of all life on Earth, and are deeply interconnected.

These strategic priorities are equally important and can sometimes be in tension with each other. To meet these priorities, we will need active engagement at every level of Sierra Club to ensure our decisions reflect local conditions while maintaining nationwide consistency. Maintaining a unified voice will be crucial to our continued effectiveness and credibility as an organization committed to climate action, conservation, and equity. We are one Sierra Club.

The 2022 Inflation Reduction Act, and other federal, state and local policies promoting rapid deployment of renewable energy and energy transmission projects, creates an opportunity to realize needed expansion of renewable energy. We anticipate a need for tens of thousands of new projects (anywhere from 35-75 gigawatts per year) and a need to double or triple the pace of transmission buildout in the coming decades. (Larson, et. al. 2020). There are also likely to be hundreds of new local, state and regional policies proposed that can either promote or inhibit renewable energy and transmission siting and deployment. At the same time, anti-renewables sentiment is growing across the country, particularly in rural areas. This opposition is in part backed by fossil fuel interest groups, and we must be diligent in separating legitimate siting concerns from propaganda that is not grounded in science or fact. For example, renewable energy opponents have made baseless claims that offshore wind exploration and development is responsible for whale deaths off the East Coast, and groups have made unsubstantiated allegations of cancer risks related to renewable energy projects.

At the same time, we are in the midst of the sixth mass extinction – the first mass extinction directly caused by humans. In the last 50 years, the world's wildlife

populations have plummeted by two-thirds, as a result of our inaction to address the rapidly-accelerating extinction of wildlife and plants worldwide. In the U.S., forty percent of wildlife and thirty-four percent of plant species are in danger of extinction. The number one driver of extinction is ongoing, widespread destruction of habitat that imperiled species need to thrive. Permanently protecting 30 percent of lands and waters by 2030 nationally is critical to stemming extinction and loss of biodiversity, and to addressing the climate crisis through retention of intact natural ecosystems. Sierra Club's national "30x30" campaign, an integral part of our 2030 Strategic Framework, is part of a global movement to protect biodiversity, including the Biden administration's "America the Beautiful" initiative to protect 30% of US lands and waters by 2030. Some states have already passed 30x30 legislation. Natural ecosystems draw down and store atmospheric carbon and help buffer animal, plant and human communities from extreme weather and other climate change impacts. Minimizing global temperature increase is also vital to mitigating the extinction crisis: the UN's Intergovernmental Panel on Climate Change's (IPCC's) 2022 Report documents the devastating threat to species from rising temperatures.<sup>1</sup>

Sierra Club supports the transition to renewable energy and protection of natural ecosystems and human communities (Sierra Club 2020). Encouraging the rapid development of well-sited, appropriately designed and managed renewable energy will allow us to replace fossil fuels with renewable energy while ensuring we meet Sierra Club's strategic priorities of protecting 30% of U.S. lands and waters by 2030 and ensuring equity. With proper siting and design to avoid, minimize or mitigate impacts to wildlife and plants, we can successfully build out the renewable energy system that is an essential part of the change needed to avert the existential crisis of climate change. (e.g. Gray and Garland 2022, Wilkinson, 2023).

## **II. Key Principles for Decision Making Regarding Siting of Renewable Energy, Energy Storage, Transmission and Infrastructure Projects and Related Land Use Policy Proposals**

Sierra Club decisions relating to projects and policies for siting renewable energy and associated infrastructure shall be consistent with the following general principles. **This policy and these principles relate to decisions addressing siting of renewable energy projects, transmission, energy storage and related land-use policies. The policy and procedures set out in this document also apply to Sierra Club actions regarding the scope of applicable environmental review of such projects. Sierra Club's policies and guidance for energy generation and usage can be found in the [Energy Resources Policy](#) (Sierra Club 2016).**

*a) Supporting rapid build out of renewable energy, transmission, and associated infrastructure to displace fossil fuels and address the climate crisis*

---

<sup>1</sup> For example, two-thirds of North American bird species are vulnerable to extinction if global temperature rise is allowed to continue at current levels.

<https://www.audubon.org/climate/survivalbydegrees/state/us/la>.

Ending fossil fuel use and transitioning to renewable energy across the entire energy system is essential to avoid the worst impacts of the climate crisis. Sierra Club's strategy to replace fossil fuels with renewable energy requires that we build a resilient, decarbonized renewable energy system which ensures that communities' needs for energy are being met at all times. Decarbonizing and otherwise reducing climate forcing agents in the industrial, buildings and transportation sectors will require a dramatic expansion of our electricity system. This will require a rapid and massive expansion of renewable energy, using a mix of distributed resources and large-scale renewable energy generation and storage projects that are interconnected by reliable transmission and distribution infrastructure.

Energy conservation and efficiency are also integral elements of decarbonization programs because they reduce overall energy use and peak demand (Sierra Club, 2016). When combined with demand management and distributed resources, energy conservation and efficiency can offset a portion of the needed new renewable energy, transmission, and other infrastructure. All of these strategies will be needed to meet our energy and climate goals. Sierra Club has adopted policies opposing several forms of energy that are sometimes described as "clean" or "lower-carbon" such as nuclear power and some types of biomass energy. These Sierra Club policies increase the amount of renewable energy which will be needed to displace fossil fuels. (The appropriate mix of energy resources is not dealt with in this siting policy and instead is contained in Sierra Club's Energy Resources Policy).

#### *b) Avoiding, Minimizing and/or Mitigating Impacts to Natural Ecosystems*

Sierra Club has established strategic goals to address the extinction and climate crises by protecting 30% of our lands and waters by 2030 as a vital first step toward protecting intact ecosystems and restoring damaged ecosystems; our longer term goal involves protecting 50% of land and waters by 2050 (Sierra Club, 2020), (Sierra Club, nd). Renewable energy projects, transmission, and associated infrastructure should be sited in places and designed in ways consistent with our conservation and biodiversity goals. Sierra Club supports avoiding and/or minimizing the use of lands and waters important for conserving biodiversity, habitat connectivity, climate refugia, carbon sequestration, food or water security and other basic human needs, and mitigating unavoidable impacts. Sierra Club prefers siting renewable energy facilities on structures, or on lands which have already been converted from their natural state and remain impacted, disturbed, or degraded by human activities. When appropriately sited, designed, and constructed, renewable energy projects can complement and even enhance our conservation and equity goals.

#### *c) Ensuring Equity for All People and Communities*

The Club's Core Values (Sierra Club, 2021) and the Jemez Principles (Moyer, 2017) guide how we should lead by practicing anti-racism, promoting community collaboration that is often missing in energy siting decisions, and working for energy justice in all communities. Sierra Club respects Tribal sovereignty and early consultation and outreach with Indigenous peoples and front line communities who will be most affected by potential developments.

Sierra Club supports building renewable energy in ways that ensure consultation and engagement of those local communities that have historically borne the brunt of the impacts of fossil pollution (Fields, 2019). Sierra Club acknowledges that historical practices have burdened communities—particularly communities of color through the practice of redlining—with the impacts of extraction, processing, burning, and disposal of fossil and nuclear fuels. Sierra Club supports equitable engagement with impacted communities regarding proposed renewable energy facilities within their geographies, to ensure new development does not cause disproportionate adverse impact, and to maximize access to and protection of natural ecosystems, areas of cultural and spiritual importance, and clean water. Sierra Club also supports renewable energy projects that are designed, sited, and operated to provide multiple benefits, including advancing environmental justice and local workforce development goals.

*d) Environmental Review and Community Engagement, Consultation, and Collaboration*

Sierra Club supports full compliance by all relevant siting authorities with all relevant environmental laws and the undertaking of environmental impact review of renewable energy projects and policies that have the potential to pose a significant impact on the environment and human communities. Environmental reviews should provide opportunity for public participation, community involvement, and meaningful Tribal consultation, fully disclose foreseeable significant impacts (including direct, indirect and cumulative impacts), and include a range of alternatives that could avoid, minimize, and mitigate adverse impacts.

We also support Sierra Club's active engagement, where resources allow, in efforts with other governmental, non-profit, and community stakeholders to identify "least-conflict" locations to site needed renewable energy development. Sierra Club may support expedited reviews for specific projects in areas where renewable energy development has previously been determined, through adequate and appropriate land management planning and consultative processes to pose a low risk to the environment or human communities. (For one example, refer to the process resulting in the Desert Renewable Energy Conservation Plan which was developed to guide siting decisions in the California desert regions (US Bureau of Land Management, 2016)). .

Finally, successful implementation of this policy will require open communication, dialogue, and cooperation between stakeholders at all levels of Sierra Club to ensure consistent decisions that reflect all Sierra Club priorities. **The process outlined below should be viewed as a minimum for successful collaboration – outreach and**

**engagement at the earliest possible level and acknowledging and embracing the roles of all stakeholders will be critical to success.**

### **III. Policy and Process for Taking Sierra Club Positions on the Siting of Renewable Energy, Transmission, Storage, and Related Infrastructure**

#### *a) Position-Taking*

The Board affirms that transitioning our economy to renewable energy and away from fossil fuels is necessary to combat the climate crisis and that proposals for renewable energy generating projects and critical infrastructure needed to support renewable energy have significant impacts for electrical supply and grids outside the boundaries of any one chapter or state. Within the context of general support for prompt development of renewable energy projects, the Sierra Club will endeavor to avoid or reduce their environmental and community impacts through improved siting and other forms of mitigation.

Decisions to oppose a specific renewable energy project must be justified with a detailed description of the significant harm that we are seeking to avoid. When the Sierra Club opposes a particular renewable energy project, it should always make clear that opposition is based on the location or other project-specific characteristics, and that the Sierra Club generally supports reliance on these energy resources. (Sierra Club, 2016, Section VII.B). We recognize that these projects and infrastructure may at times be in direct conflict with other aspects of Sierra Club's important work to protect ecosystems, wildlife and communities, which also frequently span multiple government jurisdictions and chapter boundaries. Sierra Club is a single organization, and can have only one position on a project at any time. The Jurisdiction Within the Sierra Club Policy (Sierra Club 2023) makes it clear that the national Sierra Club has the authority to decide issues of national importance. At the same time, it is vital to the grassroots nature of the Sierra Club that Chapters are engaged to bring local and state expertise, concerns and perspectives into the decision making process.

Thus, establishing the Club's position on siting of renewable energy projects and related siting policy proposals is not delegated to chapters or campaign(s), even when the site itself or the policy proposal is wholly within a chapter's boundary.

Because these projects impact both conservation priorities and electrical supply and grids regionally and nationally, and because climate change and the extinction crisis are global threats, the Board, through this policy, is delegating its authority to make final decisions on siting issues as described in Section III.c) below, after full consultation with chapter and other leaders as indicated below, provided that it always retains the authority to settle disputes in the event of a conflict.

#### *b) Scope and Definitions*

For purposes of this policy, the following definitions shall be used:

- (i) “renewable energy projects and policy proposals” shall include:
  - (a) renewable energy generating projects;
  - (b) critical infrastructure required to advance renewable energy and displace fossil fuels and nuclear power in electricity generation, including energy storage and transmission needed to deliver renewable energy generation to load centers;
  - (c) federal, state and local renewable energy siting policy proposals pertaining to the siting, location, or development of renewable energy generation and critical infrastructure within that jurisdiction that deter siting of renewable energy projects; and
  - (d) renewable energy siting policies that advance renewable energy generation but do so in a manner that impacts the protection and conservation of natural system functions and individual species.
  
- (ii) “Renewable energy” for purposes of this siting policy, includes facilities generating electricity from naturally replenishing sources such as wind, solar, some geothermal, and waves or tides. This definition specifically excludes fossil fuels, nuclear technology, incineration of municipal waste, combustion of biomass to generate electricity, or large-scale new hydroelectric dams.
- (iii) “Chapters” shall include Groups or any other sub-entities within Chapters.
- (iv) “Energy Campaign” refers to the national campaign to decarbonize and eliminate fossil fuels from the electricity sector, including the Beyond Coal Campaign. For purposes of this policy, it also refers to any successor national campaign that leads Sierra Club’s work to decarbonize the electricity sector.
- (v) “Conservation and Outdoors” refers to the national campaign to save more nature to combat the climate and extinction crises, and reducing the nature equity gap to connect all people to the outdoors. For purposes of this policy, it also refers to any successor national campaign that leads Sierra Club’s work to protect and preserve the natural environment.
- (vi) “Environmental Law Program” refers to Sierra Club’s program that uses strategic legal campaigns to fight climate change, to protect clean air, water and wild areas, and to promote justice for communities threatened by pollution.
- (vii) “Field Department” refers to national staff who have responsibility for working with chapters and National campaigns to ensure Sierra Club’s priority objectives are being met.
- (viii) “Federal Policy Team” refers to Sierra Club’s program which advocates for federal legislation, regulations, and executive actions to address Sierra Club’s priorities and goals.

### *c) Policy and Process*

Whenever any entity of the Sierra Club wishes the Sierra Club to take a public position or comment on (1) the siting of a renewable energy project, transmission lines and

associated infrastructure or (2) any renewable energy siting policy (as defined above), it must abide by this process. This consultation policy also applies to actions regarding the scope of agency analysis of potential environmental impacts regarding the siting of a renewable energy and/or transmission project (or policy proposal). As we are one Club, this policy holds regardless of the location of the project or the entity of the Club. Under all circumstances, it is expected that entities of the Club will seek to collaborate and consult with each other as early as feasible, and in good faith. No Sierra Club staff or volunteer may publicly state any Sierra Club position on the siting of a renewable energy or transmission project or siting policy proposal without having conducted the following process.

Sierra Club supports the development of well-sited renewable energy and transmission, and opposes energy development on public and private lands and in waters that are currently protected by legislative or administrative designations or that the Sierra Club has proposed for special designation based on specific environmental or wilderness criteria. (Sierra Club, 2016, Section VI). Interim guidance regarding the types of projects and areas where we generally do and do not support renewable energy and transmission development is available and can be found linked in [the form](#) used to initiate consultation referenced in subsection III c) 1) below. More extensive guidance is expected to be finalized later in 2024. Sierra Club entities recommending a public position may request expedited consultation for proposals that fall into categories that are listed as clearly support or clearly oppose under the interim or final guidance..

Consulted entities include engaged Chapter(s), the Energy and Conservation and Outdoors Campaigns or their designees, the Field Department, the Environmental Law Program (ELP) (and Federal Policy, as applicable). Each entity should designate a single individual to be their point of contact in the decision-making process.

- 1. Initiating the Consultation Process to Take a Position on Renewable Energy or Transmission Project Siting, the Scope of Environmental Review Applicable to the Siting of Such a Project, or Siting Policy Proposals:** A Sierra Club entity recommending a public position in support or opposition of the siting of a specific renewable energy, energy storage or transmission project or policy proposal, or on the scope of environmental review applicable to such projects or policy proposals (collectively, “recommended action”), must first initiate consultation as expeditiously as possible using [this form](#) identifying the consulted entities. *(Note, the form used to initiate and track consultation on these projects is intended to be a living document and may be modified to reflect experience and changes to Sierra Club’s staffing and organizational structure. Such modifications do not require Board approval or amendments to this policy.)* Any communications initiating the consulting process should identify the relevant timeline, and identify a basis for expedited review if required. The entity initiating the consultation process should clearly articulate the justification for the recommended action, as well as any known concerns regarding conflicts or alignment with Sierra Club’s Climate, Conservation, Equity, or other goals. The initiating entity should also identify reasons that the proposed action is likely to be non-controversial, if applicable.

If all entities have confirmed in writing that they have no objection to the recommended action, the initiating entity may proceed with the recommended action without further process required. If an objection is raised by an entity or an entity requests additional time, the project should proceed to Consensus Development (see 2, below). If an entity fails to respond to a recommendation and a reminder within two weeks following the form submission or three business days following the form submission if there is an imminent deadline, the recommending entity may proceed to organizational resolution pursuant to paragraph 3, below.

- 2. Consensus Development and Resolution:** If any entity objects to the recommended action, the objecting party must clearly articulate how the recommended action conflicts with Sierra Club's Climate, Conservation, Equity, or other goals, and should also propose potential ways to mitigate that conflict. The recommending entity should document any consultation with relevant allies, partners, and frontline communities and clearly state how the recommended action aligns with Sierra Club's Climate, Conservation, Equity, or other goals.

Where there is disagreement regarding a recommended action, the chapter designee(s), Conservation and Outdoors and Energy campaign representative(s), ELP liaison, and relevant Field staff involved in the decision-making process should share information and perspectives and try to reach a position by consensus. If consensus is reached, designees of the chapters, field, ELP and campaigns bear responsibility for communicating, as appropriate, the consensus position back to their respective designator as required. As noted in our Energy Resources Policy, decisions to oppose a specific facility in a preferred resource category must be justified with a detailed description of the significant environmental harm. When the Sierra Club opposes a particular project in the preferred category, it should always make clear that opposition is based on the location or other project-specific characteristics, and that the Sierra Club generally supports reliance on these energy resources. (Sierra Club, 2016)

- 3. Organizational Resolution:** If the chapter(s), campaign(s) and ELP cannot agree on a position, the issue will be brought to the following co-leads for review and consideration: Vice President for Conservation, Chief Energy Officer and Chief Conservation & Outdoors Officer (or their respective designees). The co-leads, or their designees, are authorized to establish Sierra Club's position on renewable energy siting and siting policy proposals. In the unusual circumstance that they are unable to reach a decision by consensus, they may decide to refer the matter to the full Board of Directors for a final unified position. The co-leads, or their designees, will notify the relevant chapter(s), campaign(s), and other relevant parties of their decision, and shall also copy the Board of Directors.
- 4. Record Keeping:** To create and maintain institutional knowledge, brief sharable records for each position taken shall be kept of chapter and campaign participants, relevant issues, and final positions taken. Such records, including



copies of comment letters, shall be made available to Chapters and members in a timely manner to facilitate shared knowledge of Sierra Club's voice on renewable energy and transmission siting.

#### IV. References

Fields, Leslie and Perera, Liz. 2019. *A Historic Moment: Launching an Equitable and Just Climate Platform*. Sierra Club, 2101 Webster St., Suite 1300, Oakland, CA 94612. <https://www.sierraclub.org/articles/2019/07/historic-moment-launching-equitable-and-just-climate-platform>.

Gray, Elizabeth and Michael M. Garland. 2022. "Conservationists and the Renewable Energy Industry Can and Must Work Together to Fight Climate Change." Audubon News, July 8, 2022. <https://www.audubon.org/news/conservationists-and-renewable-energy-industry-can-and-must-work-together-fight>.

Larson, E., C. Greig, J. Jenkins, E. Mayfield, A. Pascale, C. Zhang, J. Drossman, R. Williams, S. Pacala, R. Socolow, EJ Baik, R. Birdsey, R. Duke, R. Jones, B. Haley, E. Leslie, K. Paustian, and A. Swan. 2020, December. *Net-Zero America: Potential Pathways, Infrastructure, and Impacts, interim report*. Princeton University, Princeton, NJ. available at [https://environmenthalfcentury.princeton.edu/sites/g/files/toruqf331/files/2020-12/Princeton\\_NZA\\_Interim\\_Report\\_15\\_Dec\\_2020\\_FINAL.pdf](https://environmenthalfcentury.princeton.edu/sites/g/files/toruqf331/files/2020-12/Princeton_NZA_Interim_Report_15_Dec_2020_FINAL.pdf).

Moyer, Heather. 2017. *The Sierra Club and the Jemez Principles*. Sierra Club, 2101 Webster St., Suite 1300, Oakland, CA 94612. <https://www.sierraclub.org/planet/2017/10/sierra-club-and-jemez-principles>.

Sierra Club. 2023 *Jurisdiction with the Sierra Club Policy*. Sierra Club, 2101 Webster St., Suite 1300, Oakland, CA 94612. <https://community.sierraclub.org/page/jurisdiction-within-sierra-club>

Sierra Club. 2022. *2030 Strategic Framework Vision*. Sierra Club, 2101 Webster St., Suite 1300, Oakland, CA 94612. <https://www.sierraclub.org/2030-strategic-framework>.

Sierra Club. 2020. *Climate Resilience, Carbon Dioxide Removal, and Geoengineering Policy*. Sierra Club, 2101 Webster St., Suite 1300, Oakland, CA 94612. <https://www.sierraclub.org/sites/default/files/2020-Sierra-Club-Climate-Resilience-Policy.pdf>

Sierra Club. 2016. *Energy Resources Policy*. Sierra Club, 2101 Webster St., Suite 1300, Oakland, CA 94612. [https://www.sierraclub.org/sites/default/files/Energy-Resources-policy\\_0.pdf](https://www.sierraclub.org/sites/default/files/Energy-Resources-policy_0.pdf)

Sierra Club. n.d. 30x30 Conservation Agenda. 2101 Webster St., Suite 1300, Oakland, CA 94612.

[https://www.sierraclub.org/sites/default/files/program/documents/30x30Conservation\\_Lands\\_FactSheet\\_07\\_web.pdf](https://www.sierraclub.org/sites/default/files/program/documents/30x30Conservation_Lands_FactSheet_07_web.pdf)

Sierra Club. 2021. *Sierra Club Values*. 2101 Webster St., Suite 1300, Oakland, CA 94612. <https://www.sierraclub.org/sierra-club-values>.

United Nations Intergovernmental Panel on Climate Change. [Core Writing Team, H. Lee and J. Romero (eds.)] 2023. *Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*. United Nations IPCC, Geneva, Switzerland, doi: 10.59327/IPCC/AR6-9789291691647. Available at <https://www.ipcc.ch/assessment-report/ar6/>.

US Bureau of Land Management. 2016. *Record of Decision for the Desert Renewable Energy Conservation Plan*. [https://eplanning.blm.gov/public\\_projects/lup/66459/133459/163123/DRECP\\_BLM\\_ROD\\_Executive\\_Summary.pdf](https://eplanning.blm.gov/public_projects/lup/66459/133459/163123/DRECP_BLM_ROD_Executive_Summary.pdf)

Wilkinson, Jessica, Project Director. 2023. *The Power of Place: A nationwide decarbonization study*. Arlington, VA: The Nature Conservancy. [https://www.nature.org/content/dam/tnc/nature/en/documents/FINAL\\_Fact\\_Sheet-Power\\_of\\_Place-National.pdf](https://www.nature.org/content/dam/tnc/nature/en/documents/FINAL_Fact_Sheet-Power_of_Place-National.pdf).

**Adopted by the Board of Directors on October 20, 2011, amended June 21, 2012, September 25, 2014, March 17, 2022, May 18, 2024**