



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

May 4, 2018

Mr. Brian Steed, Acting Director
Bureau of Land Management
1849 C Street NW, Room 5665
Washington, D.C. 20240

Dear Mr. Steed:

The Public Lands Foundation acknowledges the renewable energy accomplishments of the BLM and encourages continued support for a diversified energy portfolio on the public lands that recognizes the growing demand for renewable energy resources as part of the Administration's commitment to achieve American energy dominance and boost economic growth. The BLM has approved over 17,000 megawatts of solar, wind and geothermal energy projects, with a current total installed and operating capacity of over 11,200 megawatts of renewable energy on the public lands. This installed capacity is enough to power some 3.4 million homes. This is a significant accomplishment and is a reflection of the hard-working and dedicated professionals throughout the BLM organization that serve our nation so well.

The BLM published a final rule in December 2016 that amended the right-of-way regulations to facilitate the responsible development of solar and wind energy projects on the public lands and to receive fair market value for such development. In September 2017, the BLM subsequently issued policy memoranda implementing several provisions of the new regulations. These policies included IM 2017-096 regarding rents and fees for solar and wind energy grants and leases, and IM 2017-099 regarding technical and financial evaluation procedures for solar and wind energy grants and leases on the public lands. We applaud these efforts and recognize these are critically important steps to assure continuity, clarity and certainty for industry and the American public in the development of renewable energy on the public lands. The BLM clearly now has the experience and the regulatory framework in place to aggressively move forward with future development, expedite the review and permitting process, provide for competitive leasing opportunities, and secure fair returns to the public for development on the public lands. It is also important that the BLM move forward in finalizing updated policies on mitigation for development activities on the public lands, including mitigation strategies for renewable energy projects on the public lands.

We acknowledge that the BLM has included funding in the FY 2019 proposed budget to support the renewable energy program and we encourage the BLM to continue to support and fund the renewable energy program in the future. This funding is critically important to support continued land use planning efforts for renewable energy development, the identification and designation of renewable energy "designated leasing areas," studies and inventory efforts, collaborative efforts with DOE and other agencies, tribal

consultation efforts, continued coordination with solar, wind and geothermal industry organizations and other stakeholder groups, competitive leasing efforts, as well as funding support for expedited permitting and inspection and monitoring activities.

We encourage the BLM to continue to expedite the review and permitting process for renewable energy projects on the public lands, including connected-action projects such as electric transmission line right-of-way authorizations on the public lands that help facilitate renewable energy development on adjacent non-federal lands. We acknowledge and applaud the current BLM efforts underway to expand the Dry Lake Solar Energy Zone in Nevada through a land use plan amendment process and the initiation of a solar energy competitive leasing process under the new regulations for the Milford Flats South Solar Energy Zone in Utah. These efforts are in addition to the processing of permit applications for the Crimson Solar, Desert Quartzite Solar, and Palen Solar projects in California; the Crescent Peak Wind project in Nevada; and the Sweetwater Solar project in Wyoming. The Sweetwater Solar project would be the first solar project on public lands in Wyoming.

The BLM also continues to respond to geothermal lease applications and process geothermal development expansion projects, including the Dixie Meadows and Tuscarora projects in Nevada. Keep up the good work and ensure the renewable energy program remains an important part of the BLM's overall energy initiatives.

The Public Lands Foundation (PLF) is a national nonprofit membership organization that advocates and works for the retention of America's Public Lands in public hands, professionally and sustainably managed for responsible use and enjoyment by American citizens. The PLF endorses and embraces the multiple use mission of the BLM. Members are predominately retired employees of the BLM from across the United States and as such have spent their careers dedicated to the sound management of these valuable lands and resources. And, they have personal knowledge of these lands and resources and expertise in their management.

Sincerely,

A handwritten signature in cursive script, reading "Edward W. Shepard". The signature is fluid and stylized, with the first name "Edward" being more prominent than the last name "Shepard".

Edward W. Shepard, President

Cc: Assistant Secretary, Land and Minerals Management, Joe Balash