



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

July 31, 2025

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

RE: Solar and Wind Energy Policy

Dear Secretary Burgum:

The Public Lands Foundation (PLF) requests that your office rescind the Secretarial memorandum issued July 15, 2025, titled "Departmental Review Procedures for Decisions, Actions, Consultations, and Other Undertakings Related to Wind and Solar Energy Facilities". This policy memorandum requires Department review and approval of every step in the permitting process for wind and solar energy projects on the public lands managed by the Bureau of Land Management (BLM). This is the time to be developing all energy sources, including affordable and abundant renewable energy resources.

The PLF is a nonprofit national organization that supports the multiple use management of the public lands managed by the BLM as prescribed by the Federal Land Policy and Management Act (FLPMA), including both renewable and nonrenewable energy resources development. We are a membership organization whose members are predominately retired former employees of the BLM. As such, our membership represents a broad spectrum of knowledge and experience in public land management at both the professional resources management and senior management levels of the agency. This experience includes the permitting of both renewable and nonrenewable energy projects on the public lands.

Requiring Department review and approval of every step in the permitting process for solar and wind energy projects on the public lands is counter to the delegated authorities of BLM Field Managers and State Directors and will only create unnecessary delays in the permitting process for increasing energy supplies in the U.S. After years of efforts to return land management decisions to BLM Field Managers and State Directors, this memorandum upends the public involvement and BLM decision-making process.

Please consider the impact of the Secretarial memorandum on ongoing BLM solar and wind energy projects. The BLM currently has 28 proposed solar energy projects in preliminary pre-NEPA review and 3 proposed wind energy projects in preliminary pre-NEPA review. There are also 8 proposed solar energy projects that are currently under full NEPA review. Most of the solar

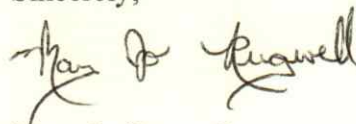
projects also include battery storage facilities to provide dependable generation capacity. These 39 total solar and wind energy projects, if approved, would provide enough power for some 8.2 million homes and in some cases would even be supporting the power demands of data centers. These proposed projects are located in the states of Arizona, California, Idaho, New Mexico, Nevada, Oregon, Utah, and Wyoming. In addition, the BLM is currently processing 10 gen-tie right-of-way transmission line applications, which also appear to be impacted by the Secretarial memorandum, that would support the development of solar and wind energy projects on non-federal lands. It should also be noted that with the provisions in the recently passed Reconciliation bill, future revenues from existing and future solar and wind energy projects on the public lands would be shared 25% with the State and 25% with the County where the project is located. The future revenues to State and local Counties will be impacted by the Secretarial memorandum.

The Energy Act of 2020 directed the Department of the Interior and the BLM to facilitate renewable energy development on the public lands and NEPA reviews have been streamlined for all energy projects. Executive Order (EO) 14156 entitled "Declaring a National Energy Emergency" and dated January 20, 2025, directed the Secretaries to "facilitate the Nation's energy supply and expedite the completion of all authorized and appropriated infrastructure, energy, environmental, and natural resources projects" for generation capacity of the United States to meet our Nation's needs. Although the EO did not specifically identify solar and wind energy under the term "energy resources", the EO did define the term "generation" to include the use of energy to produce electricity and the transmission of electricity from its site of generation. Clearly the development of solar and wind energy projects on the public lands will assist in responding to this National Energy Emergency.

Since 2021, the BLM has approved 48 renewable energy projects (13 solar, 14 geothermal, 2 wind, and 19 gen-tie lines). Instead of building on this success, the Secretarial memorandum will only constrain the further development of abundant and reliable supplies of renewable energy. Rather than requiring additional review and approval procedures specifically for wind and solar energy projects on the public lands, the Department should focus on opportunities to streamline the permitting process for all authorizations on the public lands.

I strongly urge you to rescind the Secretarial memorandum and restore the delegated authorities to the BLM for the permitting of solar and wind energy projects, as well as the processing of gen-tie transmission line rights-of-way, on the public lands that is responsive to the rising demand for both renewable and nonrenewable energy.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Jo Rugwell", written in a cursive style.

Mary Jo Rugwell
President
Public Lands Foundation