



August 15, 2023

Tracy Stone-Manning, Director
U.S. Department of the Interior
Bureau of Land Management
1849 C St. NW, Room 5646
Washington, DC 20240

RE: Call for Comments on Proposed Rule to Bolster Solar and Wind Development on Federal Lands

Dear Director Stone-Manning,

The National Association of State Energy Officials (NASEO) appreciates the opportunity to submit comments in response to the proposed rule by the U.S. Department of Interior (DOI) Bureau of Land Management (BLM) to update its renewable energy regulations to promote the development of solar and wind energy on federal lands. NASEO represents the governor-designated State Energy Directors and their offices from each of the 56 states, territories, and the District of Columbia. NASEO supports State Energy Offices in accelerating the deployment of a wide range of clean energy, such as solar and wind projects, that when combined with firm power resources facilitate grid resilience, reliability, and affordability; decarbonization; and improved energy access.

In response to DOI’s *Call for Comments to bolster solar and wind development on federal lands*, NASEO encourages consideration of the following:

1. The importance of streamlining wind and solar siting procedures on federal lands in support of responsible clean energy development.

With one in every 10 acres of land in the United States managed by the BLM, NASEO welcomes the proposed efforts to streamline review of applications and reduce fees for clean energy projects on these lands. As states throughout the country face the need to meet clean energy goals as well as support economic development and the beneficial electrification of a variety of sectors including transportation and buildings, the need for increased opportunities for clean energy generation is paramount. Many Western states have a large percentage of their lands under BLM management, which often significantly delays the progress of renewable energy development in the region. Moreover, such delays can have the effect of pushing energy development to private and state-owned lands even when that action may produce suboptimal energy, environmental, and economic outcomes. The proposed rule would open

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opportunities for greater wind and solar development by streamlining the application review process, providing greater certainty to the private sector, and reducing costs for projects. While not directly addressed in DOI's *Call for Comments*, NASEO strongly encourages greater streamlining and flexibility in electric transmission expansion as well. Additional clean energy development without appropriate transmission expansion is a significant missed opportunity.

2. Facilitating a holistic federal approach to streamlining permitting and encouraging interstate and inter-regional coordination.

A holistic approach to streamlining the permitting process would include not only siting procedures of BLM and National Environmental Policy Act (NEPA) reviews, but the permitting actions of other DOI divisions, the U.S. Forest Service, the U.S. Environmental Protection Agency, the U.S. Department of Energy, the Federal Energy Regulatory Commission, and others. Since many of these proposed rights of ways could end up crossing into multiple states, NASEO encourages BLM to support coordination among states.

3. The role of State Energy Offices in facilitating clean energy project development in support of state energy goals

NASEO encourages BLM to engage with State Energy Offices throughout this process and to gain insights into how potential projects can align with state energy plans, programs, and policies, as well as State Energy Office engagement with other state agencies and local governments. State Energy Offices have expertise in convening different stakeholders including community members, investor- and consumer-owned utilities, local governments, and the private sector. Moreover, many State Energy Offices have a significant role in electric transmission planning which is essential to increasing the number and value of clean energy projects. This provides State Energy Offices with a strong understanding of potential conflicts or land-use issues that could be shared with BLM. Many State Energy Offices are also able to provide analysis, data collection, and tools that support and streamline the permitting and siting process for clean energy developments such as wind and solar. For example, the Oregon State Energy Office implemented the Oregon Renewable Energy Siting Assessment project that developed a report and mapping tool to provide an understanding of the opportunities and constraints that come with renewable energy and transmission development in Oregon.

Finally, NASEO also encourages BLM to consider state views and concerns regarding policies, goals, and plans, ensuring that BLM recognizes the importance of the local economy and the quality of life, while also balancing the national interest.

Thank you again for the opportunity to provide comments. NASEO strongly supports the proposed rule and anticipates that this rule would effectively enhance states' ability to expand wind and solar development in their respective states and regions.

Best regards,



David Terry
President, NASEO