

April 18, 2024

The Honorable Deb Haaland  
Secretary  
U.S. Department of the Interior  
1849 C Street NW  
Washington, DC 20240

Dear Secretary Haaland:

We write today as climate, conservation, environmental justice, and tribal organizations in support of the Department of Interior Bureau of Land Management's (BLM) effort to update the Utility-Scale Solar Energy Development Programmatic Environmental Impact Statement ("Solar PEIS"). We believe that this process — if executed thoughtfully, equitably, and with due consideration to sensitive resources, habitats and wildlife, land use designations, community input, and tribal consultation — will enable the responsible and efficient siting of better solar energy projects across the West to help meet our climate imperatives and protect sensitive public lands.

On January 17, 2024, the BLM released its draft Solar PEIS to help inform project-level decision-making for solar energy projects on BLM-managed lands across 11 Western states. The plan is premised on determining the acreage of federal public lands that will be needed for solar energy projects to meet a net zero grid across all clean energy generation types. According to the BLM's analysis, 700,000 acres of BLM lands will be needed by 2045 — this figure is supported by the U.S. Department of Energy's *Solar Futures Study* (2021) and a companion report by the National Renewable Energy Laboratory (NREL) as the approximate acreage needed to achieve current and future national clean energy goals, long-term energy security, climate resilience, and improved conservation outcomes, including 100% carbon-free electricity by 2035. The plan examines variable criteria, across five action alternatives, that would broadly focus applications toward lands with lower conflicts with wildlife, cultural resources, and communities by considering variations of slope, transmission proximity, and previously disturbed or degraded lands. The plan would apply 21 resource-based exclusion criteria uniformly across alternatives to determine where solar energy applications *cannot* be initiated; and identifies design features for all projects that aim to avoid, minimize, mitigate, or compensate for any negative impacts of solar development on communities, resources, or habitats.

When finalized and implemented, this PEIS will determine where solar applications can happen and where they cannot. We believe that the BLM can best achieve its solar deployment goal by focusing applications towards lands that are both close to transmission and previously disturbed or degraded. **We urge you to select Alternative 5 in the Final Solar PEIS and Record of**

**Decision, with some key improvements such as clarifying and updating exclusion criteria. We believe this will be the best path to meet our climate imperatives by guiding development to low-conflict lands and safeguarding sensitive public lands, wildlife, cultural resources, and honoring tribal sovereignty.**

Specifically, the undersigned organizations support the following:

**We support meeting our nation's climate goals through the deployment of well-sited solar energy projects on 700,000 acres of BLM-managed land by 2045.**

Our organizations care deeply about our nation's treasured public lands, the habitats they support, recreational and economic benefits they provide, the communities and tribes who live their lives on or near them, and the archaeological, paleontological, and cultural resources they hold. We also recognize that the dire consequences of climate change threaten all of these dearly held values. BLM's Solar PEIS can honor these values while also harnessing the bountiful solar energy potential our public lands possess, and can make our public lands part of the climate solution: in 20 years, solar on BLM land could help avoid 123 million metric tons of carbon equivalent emissions each year — the equivalent of leaving 32 coal-fired power plants powered off, every year, in perpetuity.

**We can get there by guiding solar applications toward lands that are lowest-conflict and previously disturbed or degraded.**

Alternative 5 — which applies all resource-based exclusion criteria and allows applications on lands with less than 10% slope, within 10 miles of transmission lines, and on previously disturbed and degraded land — would make approximately 8.4 million acres of BLM land available for solar applications in the West. According to NREL, the area needed on federal public lands through 2045 within the 11 states covered by this PEIS is 700,000 acres, which is 8.3% of that figure. Even with some modifications, Alternative 5 can allow for substantial flexibility to reach that goal while balancing conservation of our nation's treasured lands and resources. Specifically, we support bolstering the exclusion criteria in a manner that will direct solar development to the lowest conflict areas and still leave BLM with the siting flexibility needed to meet our long-term solar needs on public lands.

Moreover, applications on lands that have already been disturbed or degraded and are already close to transmission lines tend to be closer to existing infrastructure, like roads and generation centers, and, in many cases, may already have been subject to development in the past. By design, applications on these types of public lands are less likely to result in conflicts with cultural resources, habitats, or communities — and fewer conflicts mean faster-built, better solar projects.

**We support avoiding, minimizing, mitigating, and compensating for any impacts of solar development through programmatic design criteria and the development of regional mitigation strategies where appropriate.**

Robust project requirements will help reduce conflicts between solar energy projects and communities, tribes, habitats, and cultural resources. Through these requirements, BLM can ensure every project undertakes meaningful actions to work *with* the lands, resources, and people around it — including, for example, by addressing wildlife and habitat issues early in the process and requiring developers to consult tribes, engage communities about their concerns, and negotiate community benefits agreements to address those concerns.

When conflict cannot be avoided or minimized to the greatest extent possible, we support compensatory mitigation to offset any impacts to communities, tribes, habitats, or other resources.

**We support agency engagement with impacted communities and tribal consultation to avoid repeating past harms.**

Given the extensive impact of the plan on the western United States, the BLM needs to hear from a diverse spectrum of stakeholders and sovereigns, including tribal leaders, local community members, landowners, and conservation groups. What’s more, **meaningful and robust tribal consultation must be a core component of this process**, meaning government-to-government dialogue between sovereign nations that respects tribal consultation, treaty rights, federal trust responsibilities, land use processes, and ability to participate in the market as well as cultural and spiritual ties to public lands.

Community input is vital in determining suitable areas for renewable energy projects. Local and Indigenous knowledge and community engagement are essential to ensuring that renewable development benefits tribal and non-tribal communities and safeguards public lands. **As we transition to a clean energy economy, we must prioritize input and participation from communities that historically have been underrepresented in and excluded from energy and land use decision-making, including people of color and other rural residents.** BLM should foster discussions on solar project locations that align with community concerns and minimize environmental and cultural impacts.

Early, meaningful, and effective engagement with impacted tribes and communities can also lead to more durable and efficient project siting and permitting. We encourage BLM to consider barriers to consultation and engagement, including time, funding, technical capacity, language

when engaging with tribal nations, and related logistics, and to act accordingly to remove those barriers.

**We support “Smart from the Start” solar energy deployment.**

The Solar PEIS differs from the 2012 Western Solar Plan — and other place-based efforts BLM has undertaken in the time since, like the Desert Renewable Energy Conservation Plan (DRECP) in California — in that it does not identify additional designated leasing areas (DLAs). DLAs are areas that have been extensively studied to determine affirmatively that conflicts with natural and cultural resources would be minimal. As such, project applications in these areas enjoy a streamlined approval process.

While the Solar PEIS does not identify new DLAs, we appreciate that BLM will retain most existing DLAs and continue to honor the DRECP. We urge BLM to consider expeditiously designating additional DLAs through resource management plan updates and land use plan amendments in the future.

We understand that the Department of the Interior is undertaking an ambitious and laudable broader regulatory effort to address long-standing inequities in public lands management — including by recalibrating perverse incentives that heavily favor extraction, by reducing fees for solar and wind energy development, and by putting conservation on par with other land uses. We deeply appreciate the role the Solar PEIS can and should play in this harmonized approach. **We therefore urge you to select Alternative 5, with key improvements in the Final PEIS, for faster and better solar projects and to avoid repeating the harms of the past.**

Thank you for your consideration.

Sincerely,

Alliance for Tribal Clean Energy  
Amargosa Conservancy  
California Native Plant Society  
California Native Plant Society, Alta Peak Chapter  
California Native Plant Society, Mojave Chapter  
Californians for Western Wilderness  
CalWild  
Central Oregon LandWatch  
Climate Action Coalition of Wood River Valley  
Conservation Colorado  
Conservation Lands Foundation  
Conserve Southwest Utah

Creation Justice Ministries  
Earth Ethics, Inc.  
Earthjustice  
EcoFlight  
Elders Climate Action  
Evergreen Action  
Extreme Weather Survivors  
Friends of the Inyo  
Friends of Plumas Wilderness  
Great Old Broads for Wilderness  
GreenLatinos  
League of Conservation Voters  
LEGACY-The Landscape Connection  
Los Padres ForestWatch  
Montana Environmental Information Center  
Morongo Basin Conservation Association  
National Audubon Society  
National Parks Conservation Association  
Native American Land Conservancy  
Natural Resources Defense Council  
New Mexico Wild  
Northern Front Range Broadband of Great Old Broads for Wilderness  
Oregon Natural Desert Association  
Protégéte  
Resource Renewal Institute  
Rocky Mountain Wild  
Sierra Club  
Southern Utah Wilderness Alliance  
The Alliance for Collective Action  
The Pew Charitable Trusts  
The Wilderness Society  
Union of Concerned Scientists  
Western Colorado Alliance  
Western Environmental Law Center  
Western Resource Advocates  
Wyoming Outdoor Council

