

October 20, 2015

The Honorable Secretary Jewell
U.S. Department of the Interior
1849 C St NW
Washington DC, 20049

Dear Secretary Jewell:

As former Public Utility Commissioners and energy office directors, we want to applaud the Department of Interior's efforts to diversify our public lands energy portfolio with renewable energy. As you know the Playa Solar Project located in the first solar energy zone designed by the Department in Clark County, Nevada is producing energy at one of the lowest prices ever offered for solar: \$39 per MWh. Tapping renewable energy potential on public lands can benefit consumers, the environment and our economy when done in the right way. **While the Administration has made significant progress to expand renewable energy, we urge you to establish regulations governing the procedures for developing wind and solar energy on public lands by prioritizing and finalizing the rules under development¹.**

Adopting standard guidelines for leasing and permitting will bring stability and certainty to the process for developing renewable energy. This in turn will encourage investment by wind and solar developers and utilities. Currently the BLM uses the same right-of-way process to permit renewable energy that it does to permit roads and telephone lines. Modernizing leasing by shifting to a competitive format, as is already the practice for other forms of energy, will promote a fair and competitive business environment while streamlining the application process. Greater confidence in the process, timing and costs for developing wind and solar energy on public lands is needed. Finalizing the proposed rule is an important step.

In addition, we are pleased to see the proposed rule provide incentives for development in appropriate areas. Addressing environmental issues early in the process and identifying areas with high energy potential can help utilities plan for transmission and allow projects to move forward quickly.

Developing renewable energy on public lands can help western states meet their renewable portfolio standards and the new state Clean Power Plan carbon dioxide reduction targets. We thank you for your efforts to encourage and plan for future development and look forward to seeing this important rulemaking finalized.

¹ RIN 1004-AE24 <http://www.reginfo.gov/public/do/eAgendaViewRule?pubId=201410&RIN=1004-AE24>

Sincerely,

Matt Baker
Former Commissioner
Colorado Public Utilities Commission

Leisa Brug
Former Director
Arizona Governor's Office of Energy Policy

Jeff Burks
Former Director
Utah Office of Energy and Resource
Planning

Mark Ferron
Former Commissioner
California Public Utilities Commission

Dian Grueneich
Former Commissioner
California Public Utilities Commission

Roger Hamilton
Former Chairman
Oregon Public Utility Commission

Timothy Hay
Former Commissioner
Nevada Public Utilities Commission and
Former Nevada Consumer Advocate

Ron L. Lehr
Former Chairman
Colorado Public Utilities Commission

Jason Marks
Former Commissioner
New Mexico Public Regulation Commission

William Mundell
Former Chairman
Arizona Corporation Commission

Amanda Ormond
Former Director
Arizona Energy Office



SAGUACHE COUNTY

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April 5, 2016

Mr. Neil Kornze, Director
Bureau of Land Management
Department of the Interior
1849 C Street NW, Rm. 5665
Washington DC 20240

Dear Director Kornze:

As elected officials representing western counties, we recognize that tapping the world-class renewable energy resources on public lands can provide numerous benefits to our communities when done in the right places and in the right ways. Responsible development of wind and solar resources can diversify rural economies, creating construction jobs and local tax revenue. To fully capitalize on this opportunity, we respectfully urge you to finalize the Bureau of Land Management's (BLM) proposed wind and solar leasing rulemaking.

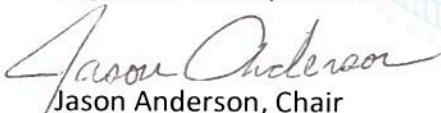
Creating a favorable business and investment environment is a priority for our counties, particularly for renewable energy. To create this environment, we need stable, predictable costs and policies for developing on public lands that help curtail lengthy administrative processes and expensive reviews that have stalled development in the past. Likewise, we support efforts to incentivize development in designated areas. Selecting appropriate places will help avoid or minimize impacts to other multiple uses, including recreation, conservation and grazing that are critical to our communities.

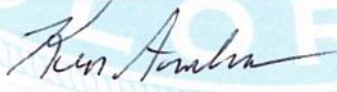
Additionally, we believe a long-term approach for renewable energy development on public lands should guarantee a portion of revenues are invested in affected communities. This is already the practice for other forms of energy development on public lands. This would help compensate our counties for the additional staff time, capital expenditures and infrastructure and maintenance costs associated with increased development. We encourage BLM to seek authority to support counties like ours that depend on public lands through enactment of the Public Land Renewable Energy Development Act of 2015 or similar legislation.

The elected officials signed below actively support and pursue public policy that balances the health of our counties with development of clean energy. We thank you for your continued work to support responsible renewable energy development on public lands throughout the West.

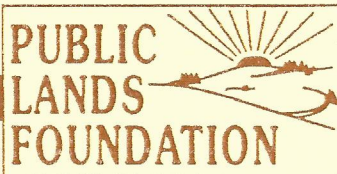
Sincerely,

Saguache County Board of County Commissioners


Jason Anderson, Chair
Chairman


Ken Anderson
Commissioner


Tim Lovato
Commissioner



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

October 5, 2015

Mr. Neil Kornze, Director
Bureau of Land Management
1849 C Street NW, Room 5665
Washington, D.C. 20240

Dear Mr. Kornze:

The Public Lands Foundation is proud of the progress BLM has made in diversifying our nation's energy portfolio to meet the growing demand for renewable resources since 2009. In just six years, the Bureau has nearly realized the President's vision of permitting 20,000 MW of renewable energy on public land by 2020. This is a reflection of the high caliber, hard-working and dedicated professionals throughout the BLM organization that serve our nation so well.

Last September, the BLM published a draft rule to amend existing regulations to facilitate responsible solar and wind energy development and to receive fair market value for such development. This was a very important step to assure continuity, clarity and certainty for industry and the American public. We believe it is just as important to bring this complex task to fruition with publication of a final rule as soon as possible. With the completion of 45 wind and solar authorizations, we believe the BLM clearly has the experience now and understands the best way to move forward with future developments and securing fair returns for that development.

Because a single rule cannot take in every aspect of land management, we believe that it is important that mitigation certainty be a key complement to this rule. The Secretary of the Interior laid a strong foundation in Secretarial Order 3330: *Improving Mitigation Policies and Practices of the Department of the Interior*. It would be critical to use the variety of broad scale mitigation examples employed by the BLM and industry during the past six years and develop a policy on mitigation for renewable development and rights-of-way to coincide with a final rule as well.

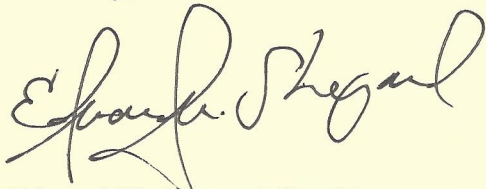
We also believe it is important that the final rule provides a mechanism that recognizes and credits efforts already made by companies or individuals during a competitive leasing process. That is, companies or individuals who have already invested in the testing and development planning for potential renewable energy sites. This would help insure a diversity of industry participants in the competitive process, as well as establish lasting direction to guide renewable energy development into the next century.

As a group of professional and experienced public land managers, we urge you to move forward with the final rule and complementary mitigation policy to help the citizens of

this great Nation while providing good stewardship of our National Public Lands and resources.

The Public Lands Foundation (PLF) is a national nonprofit membership organization that advocates and works for the retention of America's National System of Public Lands in public hands, professionally and sustainably managed for responsible use and enjoyment by American citizens. PLF endorses and embraces the multiple use mission of the BLM. Members are predominantly 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. Many of our members spent their careers managing the National Public Lands located throughout the West. They have personal knowledge of these lands and resources and expertise in their management.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward W. Shepard". The signature is fluid and cursive, with the first name "Edward" being more prominent than the last name "Shepard".

Edward W. Shepard, President

Cc: Assistant Secretary, Land and Minerals Management, Janice Schneider
Assistant Secretary, Policy, Management and Budget, Chris Sarri

Archive Search

April 10, 2016

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BLM must act to ensure a bright future for renewable energy on public lands

TIMOTHY HAY

Special to the Review-Journal

There are many pathways toward a cleaner energy future, but any path in the west must at points traverse our public lands. This creates an enormous opportunity for Western states.

Sen. Harry Reid has worked tirelessly to ensure that Nevada is a leader in both solar development and preservation of public lands.

Recently, the Department of the Interior has increased its efforts to encourage clean power on public lands in a responsible way. Last year the Bureau of Land Management proposed a new rule revising the permitting process for projects generating solar and wind energy on public lands.

This modern process has been tested on projects such as Nevada's Dry Lake Solar Energy Zone – and has proven its value to both protect and promote responsible development. It is now time for BLM to finalize that rule and allow it to take effect across the country.

In recent years there has been growing interest in the world-class renewable energy resources found on western public lands. Renewable energy on public lands today looks drastically different from a decade ago or even when President Obama took office in 2009.

Five years ago, no solar projects had been approved or developed on federal land. Today, 34 large-scale solar projects have been approved and some are already producing clean electricity for the nation's use and advancing carbon reduction at a significant scale. Some of these projects are among the largest and technologically advanced in the world. A key to this success has been providing stability and certainty for future energy development.

Finalizing the proposed rule from the BLM will ensure that this stability and certainty exists for all renewable energy projects on public lands.

The first step to securing development is planning that identifies areas with high energy potential and addresses environmental issues early in the process to allow projects to move forward. Nevada's Dry Lake Solar Energy Zone has demonstrated the benefits of the new process. Early investment to identify suitable places for development where environmental conflicts were minimal allowed expedited permitting for projects. Providing these advantages to all clean energy projects on public lands simply makes sense.

Establishing a more efficient and predictable permitting process is another way to add clarity and confidence for developing renewable energy. Fortunately, the proposed rule from BLM is tailored to the unique characteristics and impacts of modern, large-scale renewable energy

projects. This process will establish the stable, predictable policies that businesses and investors need to invest in renewable energy. A number of former western public utility commissioners have signed a letter calling for completion of these guidelines, recognizing that a sound and stable renewable energy program benefits consumers.

Western public lands will be key to unlocking a clean energy future. Establishing the best policies and practices to ensure responsible development now will pay off in the long run – not only for our economy, but for our air, land and water as well. The BLM should finalize its proposed rule, and clear the way for responsible and efficient solar wind development on our public lands.

Timothy Hay is former member of the Nevada Public Utilities Commission and a former Nevada consumer advocate.

October 27, 2015

The Honorable Secretary Jewell
U.S. Department of the Interior
1849 C St NW
Washington DC, 20049

Dear Secretary Jewell,

As organizations, companies and advocates who support clean energy deployment, we applaud the U.S. Department of the Interior's efforts to diversify our public land's energy portfolio with environmentally responsible wind and solar energy. Tapping clean energy potential found on public lands has numerous benefits – from strengthening our economy to reducing our reliance on fossil fuels and mitigating the impacts of climate change. Importantly, developing clean energy on public lands can help states and utilities meet our country's climate goals.

Under your leadership, significant progress has been made to adopt a smarter approach to development that facilitates clean energy while safeguarding wildlife and wildlands. Addressing environmental issues early in the process and identifying areas with high renewable energy resource potential can help plan for transmission and allow projects to move forward quickly when the market is right. We look forward to working with you to build upon the progress made to speed permitting and avoid environmental conflict.

One opportunity critical to establishing an enduring renewable energy program for public lands is the Department's proposed wind and solar leasing rulemaking¹. Clean energy businesses and utilities need stable, predictable policies and regulations to invest in projects. Greater confidence in the process, timing and costs for developing wind and solar energy on public lands is needed. **We encourage you to prioritize the completion of the solar and wind rule so that it is in effect by the end of 2016.**

As the leading clean energy companies and environmental organizations in the West we thank you for your efforts to encourage and plan for future development and look forward to working with you to ensure environmentally responsible wind and solar energy succeeds on public lands.

Sincerely,

¹ RIN 1004-AE24 <http://www.reginfo.gov/public/do/eAgendaViewRule?pubId=201410&RIN=1004-AE24>

Defenders of Wildlife

Juliette Falkner
Senior Director Renewable Energy

Grand Canyon Trust

Anne Mariah Tapp
Energy Program Director

Islands Energy Coalition

Bill Appel
Authorized Agent

JASenergies

Julia Prochnik
Founder

Keep Yellowstone Nuclear Free

Ryan Krueger
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Natural Resources Defense Council

Carl Zichella
Senior Policy Advocate

Northwest Energy Coalition

Fred Heutte
Senior Policy Associate

Sonoran Institute

John Shepard
Senior Director of Programs

Southwest Power Group

Gary Crane
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Utah Clean Energy

Sarah Wright
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Vote Solar

Jim Baak
Program Director, Grid Integration

Western Resource Advocates

Jon Goldin-Dubois
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