



National Association of Conservation Districts

March 1, 2023

U.S. Department of the Interior
Bureau of Land Management
1849 C Street, N.W.
Washington, D.C. 20240

RE: DOI-BLM-HQ-3000-2023-0001-RMP-EIS, the Western Solar PEIS/RMP

Thank you for the opportunity to provide comments in response to the Bureau of Land Management's (BLM) request for feedback to inform the agency's resource management plan (RMP) amendments and update of the programmatic environmental impact statement (EIS) for the BLM's utility-scale solar energy planning. NACD supports many of the suggestions included in the comments submitted by Nevada's State Land Use Planning Advisory Council (SLUPAC). These comments are intended to support many of the suggestions provided by SLUPAC and encourage their implementation on a broader scale.

The National Association of Conservation Districts (NACD) is a 501(c)(3) nonprofit organization that represents America's 3,000 conservation districts and the 17,000 men and women who serve on their governing boards. Conservation districts are local units of government established under state law to carry out natural resource management programs at the local level.

As BLM works to amend the RMP and update the EIS for solar energy planning, NACD supports efforts to balance renewable energy development with the agency's multiple use mandate on public lands. NACD supports BLM's "Smart from the Start" approach to renewable energy development, which incentivizes development in areas with the highest generation potential and fewest resource conflicts. This approach supports solar development on lands that are already impacted, including former mine sites, brownfields, and other disturbed areas. NACD supports incentivizing the development of solar projects on these lands to avoid and minimize land use planning conflicts, multiple-use conflicts, and negative impacts on wildlife, while also conserving natural resources and beneficially re-purposing impacted land.

A high percentage of land within the six midwestern states included in the BLM's 2012 Western Solar Plan and the five additional states under consideration to be added, is managed by BLM. It is critical that BLM carefully considers the impacts solar energy development will have on the economies, future land uses, and cultural and natural resources of states, tribes, and local governments across the Western United States. Identifying and prioritizing lower-impact areas where renewable energy generation, storage, and transmission can be reliably deployed will be important to successfully planning and developing solar energy projects.

As the BLM develops the RMP and PEIS, NACD encourages the agency to communicate and coordinate closely with a wide range of local stakeholders including tribes, state agencies, local governments, and conservation districts that have specific knowledge and an on-the-ground understanding of local land use policies and management activities. NACD believes it is critical to build effective working relationships and open channels of communication with these stakeholders at each step of the planning process to ensure consistency with local land use plans



and policies, assist with identifying and avoiding harm to cultural and natural resources, and maximize benefits to local communities. NACD also encourages BLM to collaborate with the local BLM staff, seek to complement broader state and regional projects, and avoid interfering with additional planning opportunities unrelated to solar projects.

NACD supports BLM coordinating federal solar energy development plans and local land use plans to protect and preserve the resources of the states and the future needs of residents. Solar energy project planning and development on public lands should be prioritized in areas that are identified in both local and federal land use plans.

Local partners have noted that states lack comprehensive data on the planning and tracking of renewable energy development. To address this issue, NACD encourages the BLM to map and provide accounting for renewable energy development that has been permitted or proposed on public lands. BLM should also develop policies to discourage speculative renewable energy projects on public lands that interfere with important land management activities and unnecessarily consume staff time and resources. Improving the vetting, tracking, and mapping of renewable energy proposed on all public lands will help local stakeholders understand the full scope of approved and pending renewable energy projects across the Western United States.

NACD also encourages the PEIS to consider the full life cycle impacts of renewable energy deployment. At the end of a project's life cycle, evaluating decommissioning standards can help to achieve favorable outcomes, including identifying the most appropriate location and method to dispose of renewable energy equipment to minimize or avoid negative end of life impacts on host communities.

Thank you for your consideration of NACD's comments. We look forward to working with BLM and other federal and local partners to enable the responsible development of our country's solar energy resources.

Sincerely,

A handwritten signature in black ink that reads "Kim LaFleur".

Kim LaFleur
NACD President