

Scott Carey

From: Peter Gower <peter.gower@TNC.ORG>
Sent: Tuesday, November 8, 2022 4:38 PM
To: Scott Carey
Subject: 11/10 SLUPAC Meeting
Attachments: TNC Recommendation Letter for NV RMP Modernization and Energy_Infrastructure Plans.pdf

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Hi Scott,

Happy Election Day. I hope all is well with you. Just wanted to give you heads up that I plan to attend Thursday's SLUPAC meeting and would like to give a brief public comment regarding the BLM's RMP modernization project. Earlier this year, TNC Nevada shared the attached letter with Director Raby supporting the RMP effort, but with strong support for a more focused, near-term planning effort for renewable energy and transmission. A statewide energy and infrastructure planning process and plan could:

- Provide an urgently needed planning framework for identifying low-conflict areas for new renewable energy development and transmission projects on BLM-administered lands
- Streamline future permitting for new projects in the identified priority areas
- Maximize BLM staff time
- Provide a consistent planning framework and timelines for industry

We believe the BLM can finish the focused plan by late-2024 and gain economies of scale during the NEPA process for the full RMP modernization effort.

Please let me know if you need anything else from me ahead of the meeting.

Thanks!

Peter

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Infrastructure, and Land Use*

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July 18, 2022

Director Jon Raby
Bureau of Land Management
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RE: Support for Nevada RMPs Modernization Project and Recommendation for Nevada Energy Siting and Transmission Infrastructure Plan

Dear Director Raby:

The Nature Conservancy (TNC) commends the Bureau of Land Management (BLM) Nevada State Office (NVSO) for pursuing a resource management plan (RMP) modernization project that would result in 12 RMPs capable of providing a current planning framework for BLM-administered lands in Nevada. TNC recognizes that agency-wide, the BLM has many priorities, including the need to develop, revise, or amend RMPs for other areas throughout the country. We strongly support the BLM prioritizing planning in Nevada. The average age of a RMP in Nevada is 23 years old. RMPs published in the 1980s or 1990s do not provide the necessary planning framework to guide complex decisions on BLM-administered lands in Nevada. Modern RMPs are critical for the BLM to effectively manage public lands pursuant to the agency's multiple use and sustained yield mission under the Federal Land Policy and Management Act.

TNC recognizes that Nevada needs modern RMPs to underpin comprehensive and effective land and water conservation, climate resilience, and associated benefits to nature and people. At the same time, there is an urgent need to plan for energy generation and transmission build out. Accordingly, we are recommending the BLM prepare a statewide energy siting and transmission infrastructure plan as part of the broader RMP modernization project under a standalone environmental impact statement (EIS) and record of decision (ROD). This approach has many benefits, which we outline below.

We urge the BLM to allocate the necessary funding and commit the staff resources to fully implement the RMP modernization project, including a statewide energy and infrastructure plan, as quickly as possible. TNC is prepared to work with the BLM and provide the necessary support to help implement the project.

Recommendation for a Nevada Energy Siting and Transmission Infrastructure Plan

One of the fundamental needs for modern RMPs is to guide renewable energy project siting and transmission infrastructure alignments. This need is immediate. The ongoing build out of renewable energy generation, battery storage, and transmission infrastructure in Nevada is directly influencing the future condition of all other resources and resource uses for which the BLM manages in Nevada. Accordingly, TNC recommends the BLM develop a Nevada-wide energy siting and transmission infrastructure plan as part of the RMP modernization project. The purpose of the plan would be to direct the responsible development of renewable energy and transmission statewide. The outcome of the plan would be focused amendments to existing RMPs to designate new priority renewable energy development areas (PREDAs) and revised or new utility corridors to align with the PREDAs. The PREDAs would include existing designated leasing areas (DLAs) and solar energy zones (SEZs) with potential amendments to those areas. Collectively, the PREDAs would establish a comprehensive framework for smart-from-the-start siting of renewable energy projects and transmission infrastructure by identifying the locations where renewable energy development and transmission could occur with the least potential for impacts on other resource values and uses.

We hope the Department of the Interior's (DOI's) Fiscal Year 2023 budget includes sufficient funding for the BLM Nevada to initiate the full RMP modernization project. Under a fully funded RMP modernization scenario, the BLM could analyze the PREDAs and corridor amendments as part of the broader RMP modernization project EIS and include energy and infrastructure decisions as part of the suite of other planning-level decisions within each ROD.

Alternatively, the BLM could move forward with the energy and infrastructure plan in parallel with the RMP modernization project EIS. Under this scenario, the BLM would develop two EISs, one specifically analyzing the PREDAs and utility corridors, and the other for the remaining elements of the RMP modernization project. TNC estimates the BLM could complete the energy and infrastructure-focused EIS and issue a ROD within 18 months following the publication of a Notice of Intent. The BLM could proceed with the full RMP modernization project EIS process concurrently with the energy and transmission infrastructure plan or stagger the process so that the RMP modernization project EIS could incorporate by reference the National Environmental Policy Act (NEPA) analysis prepared for the energy and transmission infrastructure plan EIS.

Developing a standalone energy siting and transmission infrastructure plan EIS and ROD would have the following benefits:

- ***Address an urgent and dynamic planning need in the near term***

Even with committed partners and multi-level support within the agency, it will be several years before the BLM is able to complete the RMP modernization project EIS and publish RODs for the RMPs. In the meantime, many RMP planning areas will continue experiencing profound changes resulting from individual energy and infrastructure projects. Once the RODs for the RMPs are in place, it could be too late to meaningfully address the energy build out because project-level EISs would already be in progress or RODs issued. Under this scenario, project-level decision making would drive the planning process. Initiating the energy and transmission planning process independently would allow the BLM to complete the NEPA process and establish the planning framework for renewable energy and transmission build out sooner, ideally by late-2024. The energy and transmission infrastructure plan and ROD would contribute to a more robust and informed RMP modernization process because the BLM would have a better basis from which to understand the interactions and cumulative implications of energy and transmission build out on other resources and uses.

- ***Save time and costs by establishing the environmental baseline for full RMP project***

TNC estimates the two-pronged approach could reduce the time and costs for the full RMP by up to 50% compared with the single EIS approach. This is because of efficiencies gained in the NEPA process. As part of an energy and transmission plan EIS process, the BLM would conduct public scoping to identify issues; describe the affected environment; and analyze the direct, indirect, and cumulative impacts of the PREDA and utility corridor designations. The issues identified through scoping and the associated NEPA documentation would directly inform the full RMP modernization project EIS. In many cases, the full project EIS could incorporate by reference the information from the energy and transmission EIS, thereby reducing the workload, costs, and timeline associated with the full project. Additionally, the narrower scope of the energy and transmission EIS would minimize the potential for delays during the NEPA process.

- ***Support streamlined permitting of new energy and infrastructure projects***

Currently, the BLM is reacting to project applications and reviewing them one-by-one. This is inefficient. For any solar energy application submitted for a project outside of a DLA, pursuant to Instruction Memorandum 2022-027, the BLM must first screen the project and determine its priority level. Then, for higher priority projects, the BLM conducts the variance process, which includes initial analysis and internal and external engagement. Following those steps, the project is ready for the NEPA process. A statewide plan that includes more PREDAs would expand the capacity for projects in

low-conflict areas. Projects proposed in PREDAs would by default be high priority and avoid the variance process. With an energy and transmission infrastructure plan, more projects could proceed directly to the NEPA phase, resulting in shorter permitting timelines and a smarter and faster transition to clean energy.

- ***Maximize RECO staff time***

Now is the perfect time for the BLM to initiate an energy and transmission infrastructure planning process. As the Nevada BLM staffs up its Renewable Energy Coordination Office (RECO), subject matter experts will be in place to help identify PREDAs and utility corridors. RECO staff, especially in the Southern Nevada District and NVSO, are already well versed in identifying resource conflicts associated with energy development. Identifying PREDAs state-wide would use the same logic framework as the current project-level prioritization process. Instead of identifying these conflicts project-by-project, the process of identifying and designating PREDAs would proactively identify areas with lower potential for resource conflicts. Allocating a portion of RECO staff time to plan for future energy and transmission siting will save time and resources compared with a project-by-project approach.

- ***Consistent permitting requirements and timelines***

TNC applauds the BLM for re-establishing the RECOs and implementing a priority screening process for new energy applications. These are important steps toward achieving the Administration's goal of 25 gigawatts of renewable energy permitted on federal lands by 2025. At the renewable energy roundtable hosted by DOI Secretary Haaland and the BLM, during which Secretary Haaland announced the creation of the RECO, industry participants expressed a common frustration about the lack of consistent permitting requirements and mitigation standards from project to project. A centralized RECO team contributes to a more consistent permitting process. TNC's recommendation for an energy and transmission plan would lead to even greater consistency because the BLM would review and analyze applications in PREDAs according to the same standards. Like the current DLAs, TNC recommends the BLM establish clear mitigation requirements and design guidelines as part of the process for designating each PREDA. Establishing these standards at the plan level would set clear expectations for industry looking to develop in the PREDAs.

Similarly, the planning process is an opportunity to understand and address concerns regarding energy and transmission development in certain areas without the pressure of a specific project. This provides an opportunity for broader community-level and other stakeholder support around proposed PREDAs and utility corridors. Subsequent projects in these areas would be less prone to opposition that can delay project approval and

implementation. The outcome is a more predictable permitting timeline for projects in PREDAs and corridors.

- ***Implements recommendations in the Section 368 Energy Corridor Review Report***

In April 2022, the BLM released the Energy Policy Act of 2005 Section 368 Energy Corridor Review Final Report for Regions 1-6. The report includes several recommended utility corridor revisions and deletions in Nevada. A Nevada energy and transmission infrastructure plan approach would allow the BLM to prepare one EIS that would comprehensively evaluate and implement the report's recommendations. This would avoid the need for multiple costly and time-consuming environmental assessments for individual corridors. Because transmission location and capacity are fundamental factors influencing the location and success of renewable energy projects, evaluating the corridor revisions concurrently with the PREDA designations would ensure there are appropriately sized and appropriately sited corridors connecting to the PREDAs.

The RMP modernization project is critical for establishing a current planning framework for BLM-administered lands in Nevada. A successful RMP modernization project requires commitment within all levels of the BLM and support from partner local, state, and federal agencies and bodies, tribes, and nongovernmental organizations. TNC strongly supports this project and urges the DOI to allocate the necessary funding to implement it. Our recommendation to prepare a statewide energy siting and transmission infrastructure plan as part of the broader RMP modernization project but under a standalone EIS and ROD has multiple benefits. Most importantly, it will provide a smart-from-the-start framework that effectively balances the energy and transmission development with the conservation and protection of biodiversity, cultural resources, recreation opportunities, and the many other resources and uses on BLM lands in Nevada.

Please feel free to contact Peter Gower at (775) 446-5525 or peter.gower@tnc.org if you have any further questions or would like to schedule a time to meet and discuss in more detail.

Sincerely,



Mauricia M.M. Baca
State Director
Nevada Chapter
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Energy, Infrastructure, and Land Use Strategy Director
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cc: Carolyn Sherve, RMP Modernization Project Manager
David Pritchett, Senior NEPA Planner