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STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
State Land Use Planning Advisory Council

February 3, 2023

Solar Energy PEIS Scoping
1849 C Street NW
Washington, DC 20006

Re: Scoping Comments for DOI-BLM-HQ-3000-2023-0001-RMP-EIS, the Western Solar PEIS/RMP

On behalf of the Nevada State Land Use Planning Advisory Council (SLUPAC), I am providing this letter, approved by SLUPAC on February 3, 2023, outlining the Council's scoping comments on the Western Solar Preliminary Environmental Impact Statement (PEIS) and Resource Management Plan (RMP) project (DOI-BLM-HQ-3000-2023-0001-RMP-EIS).

SLUPAC is the only Governor-appointed council that has a county representative from each of Nevada's seventeen counties as well as the Nevada Association of Counties (NACO), the Nevada League of Cities & Municipalities, and the Nevada Indian Commission. SLUPAC provides recommendations and expertise on land use planning and natural resources issues and advises the State Land Use Planning Agency regarding the development of plans and statements of policy.

SLUPAC appreciates the effort to balance renewable energy with the BLM's multiple use mandate on Nevada's public lands through the Western Solar PEIS/RMP update.

At its July 9, 2021 meeting, SLUPAC endorsed the "smart-from-the-start" approach to renewable energy planning. This planning strategy guides renewable energy development to lands that are already impacted, such as former mine sites, brownfields, former agricultural lands that are no longer in production, and other disturbed areas. Should BLM prioritize a smart-from-the-start approach to energy planning in its PEIS, the BLM would likely avoid or minimize land use planning conflicts, multiple-use conflicts, loss of Animal Unit Months (AUM), and wildlife impacts, as well as reduce land consumption, conserve natural resources, address associated waste streams, and beneficially re-purpose impacted land. With about 67% of Nevada being managed by the BLM, the economies and land use plans and policies of Federally recognized Indian Tribes (Tribes), state agencies, and local governments will be impacted by the decisions and land allocations made through this planning effort. Identifying and prioritizing lower-impact areas where renewable energy generation, storage, and transmission can be reliably deployed with as little impact as possible to Nevada's communities, natural lands, cultural resources, recreation, and other future land uses is critical.

During our meeting held November 10, 2022, SLUPAC endorsed the Nevada-Wide RMPs Modernization Project proposed by BLM's Nevada State Office. We request that the solar plan RMP Amendment underway now, on a faster schedule should collaborate with the local Nevada BLM staff, complement the broader Nevada-wide RMPs project, and not prevent other planning opportunities unrelated to solar project area designations.

Nevada's population and economy continue to grow significantly. As a result, there are continuing and fast-paced land use changes occurring on Nevada's landscape related to recreation, energy production, mineral extraction, land leasing, agriculture, wildfire management, military activities, transportation, and others. SLUPAC recommends the Western Solar PEIS/RMP update happen openly and collaboratively, with a focus on local involvement and coordination. This way, the RMP updates across Nevada can be responsive to changing conditions and result in improved land use planning for the state.

Similarly, local stakeholders, including Federally recognized Indian Tribes (Tribes), state agencies and local governments have specific knowledge and an on-the-ground understanding of Nevada's land use planning policies and management activities. To help give the Western Solar PEIS/ RMP the best chance of success, SLUPAC believes it is critical to foster close communication and coordinate efforts with these stakeholders at each step in the planning process. Coordination at these levels will help assure consistency with local land use plans and policies, assist with identifying and avoiding significant cultural and natural resources, and maximize benefits to local communities. SLUPAC invites the BLM to work in close partnership with Federally recognized Indian Tribes (Tribes), state agencies, and local governments throughout Nevada in a meaningful, collaborative, and transparent manner.

SLUPAC stresses the importance of close coordination and consistency between local land use master plans and the Western Solar Plan to protect and preserve the resources of the State while providing for the future needs of residents. The development of renewable energy projects on public lands should be prioritized in areas that are consistent with and support local master plan land use goals and policies.

SLUPAC notes that the state lacks a comprehensive and integrated dataset with respect to renewable energy development on Nevada's public lands. As part of this planning process, SLUPAC encourages the BLM to provide a full accounting and mapping of all renewable energy development that has been permitted or proposed on public lands throughout Nevada. The BLM should also develop policies to discourage speculative renewable energy projects on public lands throughout the state. In recent years there has been a rush by energy developers proposing large scale renewable energy projects across several hundred thousand acres of public land. Many of these projects proposed are purely speculative and can take up the valuable time of BLM field office staff and interfere with other important land management activities. Better vetting, tracking and mapping of renewable energy proposed on public lands are needed to help local stakeholders understand the full scope of approved and pending renewable energy projects across Nevada.

Renewable energy development on public lands in Nevada should be done in a way that positively contributes to the overall quality of life and economy of the entire state. In 2019, the Nevada Legislature approved Senate Bill 254 which mandated that 50% of Nevada's energy must come from renewable energy or energy efficiency measures by 2030. Since the adoption of the original Western

Solar plan, Nevada has seen a select number of large-scale renewable energy projects come into production that end up exporting all electricity generated to other states. To the extent possible, renewable energy development on Nevada's public lands should support the state's renewable energy goals, its economy and citizens. SLUPAC believes that Nevada's renewable energy goals can be met without new large-scale projects on public lands located outside of previously disturbed areas.

SLUPAC also requests the Western Solar PEIS to carefully consider the full life cycle impacts of renewable energy deployment. For example, domestic manufacturing reduces the embodied energy of renewable energy products and ultimately maximizes the overall benefit of the power produced. At the end of a project's life cycle, evaluating decommissioning standards, particularly the location and method for disposing of renewable energy equipment, will serve to avoid and potentially minimize end-of-life impacts on host communities.

In conclusion, SLUPAC appreciates the opportunity to provide these scoping comments on the Western Solar PEIS/RMP update project. If you have any questions or would like additional information concerning SLUPAC, please feel free to contact Scott Carey, State Lands Planner at 775-684-2723 or scarey@lands.nv.gov.

Sincerely,



Jake Tibbitts, Chair
State Land Use Planning Advisory Council

CC:

Governor Joe Lombardo
Senator Catherine Cortez Masto
Senator Jacky Rosen
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Congressman Mark Amodei
Congresswoman Susie Lee
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