



May 26, 2011

The Honorable Doc Hastings
Chairman, House Committee on Natural Resources
1324 Longworth House Office Building
U.S. House of Representatives
Washington, DC 20215

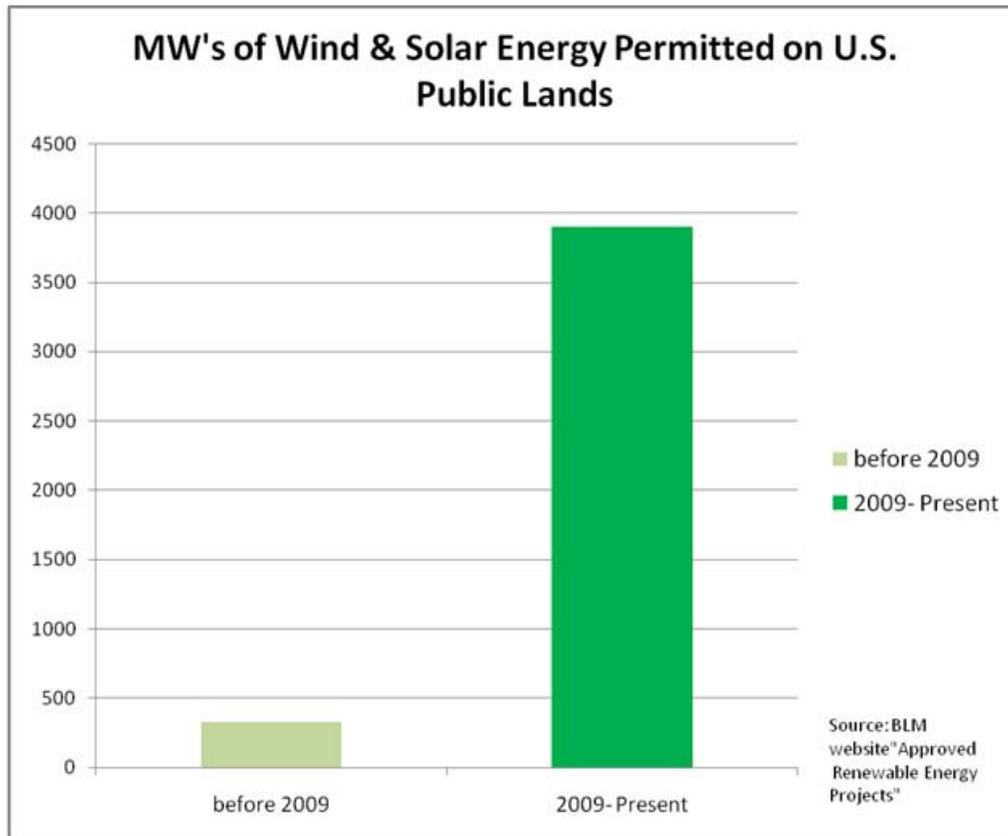
The Honorable Edward Markey
Ranking Member, House Committee on Natural Resources
1329 Longworth House Office Building
U.S. House of Representatives
Washington, DC 20215

Dear Mr. Chairman and Ranking Member Markey:

On behalf of the Natural Resources Defense Council, The Wilderness Society, and Defenders of Wildlife we are writing to express our strong support for renewable energy development on the public lands. Our collective organizations believe that this nation must embrace renewable energy as a paramount strategy in order to reduce global warming pollution and increase economic and job growth, while also ensuring energy security. We also want to share with the Members of this Committee our experience that the application of consistent environmental review in concert with a thoughtful planning process are essential elements in successfully deploying renewable energy to scale. Meeting our country's energy needs with clean renewable energy requires significant investments that must be undertaken immediately, but these investments must not jeopardize and devalue our nation's commitment to conserve this country's incomparable natural heritage.

In a dramatically short time, our nation has seen the unprecedented expansion of wind, solar, and geothermal generation across the land. Over the last two years, during one of the worst economic crises of recent history, the installed capacity of wind generated energy in this country grew by 60%. Much of the growth — present, past, and future — has or will take place on the nation's resource rich public lands. This is represented by the Department of the Interior's (DOI) pledge to establish an enduring commitment to tap renewable energy resources, especially as compared to those of previous administrations. In just two years, DOI has permitted more renewable energy projects than ever before, with many additional projects proposed for development on public lands for 2011 and 2012. The figure below displays the magnitude of this increase over the last two years. In 2010 alone, nine solar energy projects, one wind project, and two geothermal projects were permitted on public lands in the West, for a combined capacity of nearly 4,000 megawatts of power. We are supportive of the effort to transition to a renewable energy future, and commend the Bureau of Land Management (BLM) for the unprecedented effort to permit utility-scale solar and wind projects in CA and Nevada in 2010. We will continue to work cooperatively with the BLM and other federal, state and local agencies in seeking opportunities for renewable energy project development that are appropriately located in the right areas (including on lands that have been

previously disturbed lands such as brownfields), environmentally sustainable and do not undermine our efforts to conserve wildlife and natural resources.



But after years of inattention and inactivity, we must consider that renewable energy permits are being evaluated and reviewed by a BLM system that was not originally conceived for these types of technologies in mind. This makes environmental laws, including especially the National Environmental Policy Act (NEPA), indispensable to ensure that projects are built in a manner that maximizes their energy potential while avoiding impacts that would undermine the viability of sensitive environmental resources. As 40 years of experience has demonstrated, NEPA provides the tools to ensure that decisions on federally funded or authorized projects are made with the highest quality information on a range of alternatives and with public input from concerned individuals and affected communities. Rather than being a hindrance to development, our experience in working with developers, utilities, financiers, and the federal agencies on these projects, is that NEPA provides an essential blueprint to guide the approval process. In fact, NEPA ensures that these renewable energy projects are stronger, more resilient, and less likely to experience delays later in the process.

Furthermore, early stakeholder engagement established through the NEPA process saves the government money by identifying resource conflicts early, which leads to fully informed decisions. The only way to secure the successful deployment of clean renewable energy is to ensure that projects proposed in the future are as efficient, cost effective, and environmentally attuned as possible. A robust planning and permitting process is the key to guarantee that this can come about.

Unfortunately, those interests long-opposed to NEPA are hiding behind the public’s overwhelming support for clean, renewable energy in an attempt to shortcut, shortchange, or scuttle NEPA’s core provisions. They put forth a false choice of either protecting our public lands or building renewable energy quickly. More specifically, the charge has been made that the NEPA review process, along with other environmental requirements, are restricting the pace and advancement of renewable energy projects. We know that this is not true; of the nine solar energy projects permitted in 2010, the average time for environmental review was 527 days, or 1.4 years. The most recent permitting for renewable projects that received BLM’s “fast-track” status took an average of 423 days, or 1.1 years to reach a final record of decision. This is well within other permitting time frames for similarly sized projects, consistent with the timetables set out in government guidance documents, and is remarkable given that these projects are unique in scale and complexity.

Fast Track Solar Projects Approved in 2010

Project Name	State	NOI Date	DEIS Date	FEIS Dates	ROD Date	Days from NOI to ROD	Days from DEIS to ROD	Administration
Blythe	CA	November 23, 2009	April 6, 2010	August 20, 2010	October 22, 2010	333	199	Obama
Genesis	CA	November 23, 2009	April 19, 2010	August 27, 2010	November 4, 2010	346	199	Obama
Crescent Dunes	NV	November 24, 2009	September 3, 2010	November 26, 2010	December 20, 2010	391	108	Obama
Lucerne Valley	CA	July 23, 2009	February 5, 2010	August 13, 2010	October 5, 2010	439	242	Obama
Silver State	NV	June 30, 2009	April 16, 2010	September 10, 2010	October 12, 2010	469	179	Obama
Amargosa Farm Road	NV	July 13, 2009	March 19, 2010	October 15, 2010	November 15, 2010	490	241	Obama
Calico	CA	June 8, 2009	April 19, 2010	August 6, 2010	October 20, 2010	499	184	Obama
Imperial Valley	CA	October 17, 2008	February 12, 2010	July 28, 2010	October 5, 2010	718	235	Bush
Ivanpah	CA	November 6, 2007	November 10, 2009	August 6, 2010	October 7, 2010	1066	331	Bush

NOI: Notice of Intent to Prepare and Environmental Impact Statement. DEIS: Draft Environmental Impact Statement. FEIS: Final Environmental Impact Statement. ROD: Record of Decision.

We agree with you, though, in that the subject of today’s hearing is critically important as we have indeed seen actual “roadblocks” that prevent more solar, geothermal, and wind projects to proceed or move at a quicker pace, namely, uncertainty in financing and first-of-a-kind technology at this scale. One of these factors is the uncertainty that exists around the prospective status concerning federally backed financial incentives critically necessary to ensure that this nascent industry can compete domestically. For example, the Ivanpah Solar Electric Generating System and the Blue Mountain Geothermal project received renewable energy loan guarantees from the Department of Energy that were critical to their successful permitting. Development of utility-scale renewable energy projects will benefit greatly from predictable and consistent governmentally backed incentives that put them on a level playing field with other more mature energy sources.

Our conservation organizations understand these critical needs, and to that end we have aggressively supported financial and tax incentives that would secure a predictable growth path for renewables. Among these programs and incentives, we have supported:

- Extensions of production and investment tax credits;
- Extension of the highly successful 1603 Treasury Grant Program;
- Legislation such as the “10 Million Solar Roofs and 10 Million Gallons of Solar Water Heating Act of 2010;”
- The Department of Energy’s *Section 1705* Loan Guarantee Program;
- Test facilities to ensure a transition to commercial scale;
- Measures to improve planning and avoid speculative permit applications; and
- Multiple pieces of legislation to address the backlog in permits.

We have learned a great deal from our past experiences with conventional and renewable energy development. Most importantly, we have learned that a strategic and coordinated approach to designing energy generation and transmission at the beginning stages of project planning not only facilitates energy development, but also help preserve the rich natural and cultural heritage that our public lands provide. If we are to reach our common goal of successfully and efficiently meeting our country's energy needs with clean renewable energy, we must focus our attention on the true barriers to renewable energy deployment, such as financing and technology. By committing to a framework that includes thoughtful planning and siting processes, we can conserve our nation's natural treasures while also enjoying the considerable benefits associated with a new energy economy that is predicated upon the utilization of clean renewable energy.

Our organizations are fully committed to working with you on these timely issues and appreciate your strong leadership in this regard. Thank you for your consideration of this statement.

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Natural Resources Defense Council

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The Wilderness Society

Jim Lyons
Senior Director for Renewable Energy
Defenders of Wildlife