

ATTACHMENT 5 – PRE-NEPA CONCURRENCE MEMO TEMPLATE

[Use Field Office letterhead]

To: Karen Kelleher
Idaho State Director

Through: _____
_____ District Manager

From: _____
_____ Field Manager

Subject: Concurrence Request to Initiate the National Environmental Policy Act (NEPA)
Process for the _____ Project Application

RECOMMENDATION:

In accordance with IM No. ID-2023-XXX, the Bureau of Land Management (BLM), _____ Field Office, has completed the pre-NEPA assessment process and determined that it is appropriate to continue processing the _____ Project application. BLM _____ is requesting concurrence on the State Director’s _____ Project Pre-NEPA Assessment Determination.

BACKGROUND:

The BLM _____ Field Office received a right-of-way application (casefile number _____) from _____ for the _____ Project on _____, __, 20___. The proposed project covers _____ acres in _____ County. It would generate an estimated _____ megawatts of electricity. Electricity generated is proposed to be delivered to market via the _____ transmission line.

IM No. ID-2023-XXX requires a pre-NEPA assessment for applications for renewable energy development on BLM-managed lands in Idaho. Developers proposing utility-scale renewable energy development must demonstrate to the BLM that the project proposal will avoid, minimize, or compensate for adverse effects on sensitive resources prior to proceeding to application processing and analysis under the NEPA. This demonstration includes at last three meetings.

- First, the applicant meets with the BLM and members of its interdisciplinary team to discuss the general project proposal, the status of BLM land use planning for the lands involved, potential siting issues or concerns, potential environmental issues or concerns, potential alternative site locations and the right-of-way application process.
- Second, the applicant, with BLM, meets with appropriate Federal and State agencies and Tribal and local governments to facilitate coordination of potential environmental and siting issues and concerns that may require further consultation and cooperation.
- Third, the BLM hosts a meeting with the general public. The applicant or the BLM presents the proposal and addresses questions and concerns.

[List the specific dates and locations of the three meetings, as well as the specific issues that came up at the meetings.]

Findings from these meetings are incorporated into the BLM’s consideration of whether the proposed project is in an area with low resource conflict(s), and to what extent resource conflict issues may be addressed or mitigated through further processing of the application.

In accordance with IM No. ID-2023-XXX, concurrence of the State Director with the Field Manager’s favorable determination is required for a renewable energy development application to be processed. Concurrence by the State Director does not constitute an approval of the proposed project; rather, it would allow the BLM to continue processing the application and initiate its NEPA process, including public scoping and the preparation of an environmental assessment or environmental impact statement. Through the process, the BLM can complete a site-specific analysis of potential impacts from the development of the proposed project. Once completed, the NEPA analysis would serve as the basis for any future decision to either approve, approve with modifications, or deny the project.

The attached briefing memorandum further describes the coordination completed as a part of the pre-NEPA assessment process and the potential issues to address during the NEPA review process.

FIELD MANAGER DETERMINATION:

Following review through the pre-NEPA assessment process, I have determined that the _____ Project should continue to be processed and should proceed to the NEPA analysis phase. The project is generally proposed in an area of [*low*] resource conflict. There are [*minor*] conflicts with [*Resource 1, Resources 2, Resource 3, etc.*] that warrant further consideration in alternatives to be analyzed through the process. [*There are no known issues pertaining to impacts on environmental justice communities, and early Tribal consultation has not yielded substantial concerns about the project.*] I am requesting the State Director’s concurrence to proceed with the NEPA process for the right-of-way application for the _____ Project.

CONCURRENCE BY THE STATE DIRECTOR:

- CONCUR
- DO NOT CONCUR

Karen Kelleher
Idaho State Director

Attachments (X)