U.S. Department of the Interior
Bureau of Land Management

Idaho Renewable Energy Strategy

Public Engagement Report

Table of Contents

BLM, through the Department of the Interior's Collaborative Action and Dispute Resolution office, contracted with Kearns & West to develop this report. [1]

[1] Prepared by the Langdon Group under subcontract to K&W, collectively referred to as the "Project Team."

Introduction

The Bureau of Land Management (BLM) in Idaho is increasingly receiving interest regarding authorizations on BLM-managed public land for renewable energy projects. In response to the rise in interest, in February and March 2023, BLM hosted four public meetings with the following objectives:

- To assist internal and external audiences in understanding how the BLM processes renewable energy applications.
- To identify geographic areas with resource or other conflicts for consideration by applicants.
- To inform the public how they can participate in future proposed projects.
- To enhance understanding regarding the BLM's responsibilities and requirements as a federal multiple-use land manager.
- To ensure that the renewable energy application process is communicated consistently to both internal and external stakeholders, as well as to industry.

Meetings were held in Idaho Falls, Twin Falls, Meridian, and virtually, and had an open-house format to allow the public to arrive at any time during a two-hour window. At each meeting, BLM provided a brief presentation, followed by the opportunity for participants to visit with different BLM subject matter experts. Participants had the option to complete feedback forms in-person or online. In total, 262 people participated in all four meetings, and 38 feedback responses (completed forms, letters, and emails) were received prior to the requested submittal date of March 10, 2023.

Meeting notification was published primarily through a news release and BLM-managed social media outlets. The Twin Falls meeting was intentionally coupled with the Lava Ridge Wind Project Draft Environmental Impact Statement Public Open House in an adjacent room to increase the opportunity for capturing public interest.

Feedback received from these efforts is summarized in this document and will be used to inform project applicants with a sampling of public opinion regarding BLM-managed public land resource values in Idaho's southern districts. In addition to assessing potential challenges that may arise, this summary also provides the BLM and project applicants with an opportunity to conduct further research on issues specific to their projects. An applicant may decide to proceed, explore alternative locations or project designs, or conduct further outreach.

Background

The BLM manages vast stretches of public lands in Idaho with the potential for renewable energy projects. This is due to advancements in technology that have made Idaho increasingly viable for wind and solar energy projects, the presence of multiple transmission lines to connect to, and current federal law and policy directing the BLM to prioritize the authorization of renewable energy projects on public land.[2]

When the Lava Ridge Wind Project in south-central Idaho was proposed in 2018, it was the only renewable energy application received by the BLM in Idaho, at that time. Today, the BLM Boise, Twin Falls, and Idaho Falls districts are in the process of consulting with proponents for multiple renewable energy projects on public lands. Reviewing and responding to these requests requires significant staff time and resources.

The statewide strategy responds to an emerging interest in developing renewable energy projects on BLM-managed public lands. The strategy's goal is to enhance efficiency and consistency in processing applications; inform the framework for prioritizing the order in which applications are processed; make the best use of staff capacity; and increase engagement with Tribes, agency partners, stakeholders, and the public.

The BLM has developed a comprehensive list of applicable factors that project applicants must address before submitting their applications. These include but are not limited to: the availability of land; conformance with existing land use plans; financial and technical capabilities of the applicant; potential conflicts with cultural and natural resources or with public land users and proposed measures to address such conflicts; capacity of transmission infrastructure; access; efficiency of land use; water demands; and compliance with Federal Aviation Administration (FAA) requirements. The complete list is available at https://www.blm.gov/programs/energy-and-minerals/renewable-energy/strategy/idaho.

When a renewable energy project application is officially being considered on BLM-managed public lands, the public has the opportunity to provide comment at two stages in the process:

1. After an application has been submitted and has undergone an initial screening process, as part of the Pre-NEPA (National Environmental Policy Act) Assessment process, the applicant must hold a public meeting in the area affected by the potential project to discuss their proposal and gather public input on concerns and potential conflicts. The applicant addresses these conflicts and concerns in their Renewable Energy Factors Analysis Report and has an opportunity to modify and refine their proposed Plan of Development. This process is described in detail in Instruction Memorandum No. ID-2023-009.
2. For projects that advance past the Pre-NEPA Assessment stage, public comment opportunities occur during the NEPA process (e.g., during scoping or public comment periods on draft environmental documents).

[2] The Energy Act of 2020 directs the Secretary of the Interior to seek to "authorize production of not less than 25 gigawatts of electricity from wind, solar, and geothermal energy projects by no later than 2025, through management of public lands and administration of Federal laws." Following passage of this law, in Executive Order 14008, Tackling the Climate Crisis at Home and Abroad, the Biden-Harris Administration ordered the Secretary of the Interior to review siting and permitting processes on public lands to identify steps that can be taken, consistent with applicable law, to increase renewable energy production on those lands, while ensuring robust protection for our lands, waters and biodiversity, and creating good paying jobs.

Communication and Outreach

The BLM identified the following external audiences and Tribes for outreach regarding the renewable energy strategy public meeting opportunities:

- Shoshone-Bannock Tribes (consultation meetings)
- Shoshone-Paiute Tribes (consultation meetings)
- Nez Perce Tribe (written correspondence)
- Coeur d'Alene Tribe (written correspondence)
- Kootenai Tribe of Idaho (written correspondence)
- Northwestern Band of the Shoshone Nation (written correspondence)
- National Park Service
- U.S Department of Agriculture
- Federal Aviation Administration
- U.S Geological Survey
- U.S Bureau of Reclamation
- U.S. Fish and Wildlife Service
- Idaho Governor's Office of Energy and Mineral Resources (OEMR)
- State of Idaho - Idaho Strategic Energy Alliance (ISEA)
- Idaho State Department of Agriculture
- Idaho Department of Parks and Recreation
- Idaho Department of Environmental Quality
- Idaho State Historical Society
- Idaho Department of Fish and Game
- Idaho Resource Advisory Council (RAC)
- Media
- Interested stakeholders
- General public

General public outreach and notification focused on distribution of a news release [APPENDIX A] to news outlets and social media posts (Twitter and Facebook).

Public Meeting Format

BLM, through the Department of the Interior's Collaborative Action and Dispute Resolution Office, contracted with the Project Team to assist with meeting design and facilitation. It was determined early on that three in-person meetings in each of the three southern Idaho districts (Boise, Twin Falls, and Idaho Falls) and one virtual meeting would provide the public with the best opportunities to learn and participate. All meetings were held between 5-7 pm, to allow for maximum participation and minimal interference with work schedules. Meetings were held on the following dates and at the locations listed:

Date	Location
Feb. 22, 2023 (Wednesday)	Hilton Garden Inn, Idaho Falls (700 Lindsay Blvd.)
Feb. 23, 2023 (Thursday)	Canyon Crest Event Center, Twin Falls (350 Canyon Crest Drive)
Feb. 27, 2023 (Monday)	Courtyard by Marriot, Boise West/Meridian (1789 S Eagle Road)
March 6, 2023 (Monday)	Virtual Zoom Meeting

In-Person meeting format

Project Team greeters welcomed attendees at the entry table and kept an attendance count [ROOM LAYOUT: APPENDIX B]. Participants were not requested to sign-in because this was not an official public meeting within the NEPA process. Participants were informed of the following meeting format, as they entered the meeting space:

- There will be a 15-minute presentation every 20-30 minutes beginning at 5:15 pm.
- After the presentation, you can go to the other side of the room, where we have tables and chairs set up for you to fill out your feedback form, if you choose. Our staff will be there to help answer questions, provide more paper, collect your feedback forms, and direct you to the appropriate subject matter expert at stations around the room if you have specific questions or would like to learn more about a specific resource or aspect of renewable energy. There are also maps with information about different resources on BLM-managed public lands in southern Idaho.

Each attendee was provided a Frequently Asked Questions handout [APPENDIX C] and feedback form [APPENDIX D] to fill out and submit at the meeting or later online and directed to the viewing area of the BLM presentation [APPENDIX E]. There was no opportunity for questions as part of the presentation. Instead, participants were directed to the Subject Matter Experts stationed around the room for that purpose. Stations were:

- NEPA
- Botany
- Wildlife
- Recreation
- Cultural Resources
- Range & Grazing
- Renewable Energy

At the meeting exit, there was a display board describing where people can go for more information, and when and where the summary will be available on the BLM Renewable Energy Strategy website with a QR Code.

Virtual meeting format

The virtual meeting was designed to mirror the in-person format, with the addition of a pre-registration requirement. Registering in advance allowed the Project Team to ensure adequate and appropriate staffing was available to field questions and facilitate discussions.

As participants joined the meeting, the lead facilitator described the following meeting format and ground rules:

- *There will be a 15-minute presentation by BLM beginning at 5:15 pm.*
- *The Zoom chat function is open for participants to chat with the meeting host and co-hosts only. feedback will not be accepted in the chat.*
- *After the presentation, we will share a Google Form link in the chat. If you would like to provide feedback, go to the Google Form where you can provide us your input. The input gathered at these public meetings will be collected in a summary and provided to the public and all future renewable energy applicants during their pre-application meeting. The summary report will be posted at the BLM website listed on the Google Form [https://www.blm.gov/idaho-renewable-energy-strategy].*
- *The feedback form will close at 5 p.m. on March 10. Feedback must be submitted in the Google Form by that time.*
- *At 5:30 pm, after the presentation, we will open multiple break out rooms, each with a unique subject-matter expert. Between 5:30 and 7 p.m., you are welcome to enter as many or as few of these rooms as you would like to ask questions and learn more about specific topic areas.*
- *To ensure we have enough time for everyone to provide feedback and visit the break-out rooms, there will not be the opportunity for questions during the presentation. Please save your questions for the break-out rooms. If you have technical issues or questions during the presentation, we can assist with those in the main session.*
- *After the presentation, your audio and video will be available for discussion.*
- *We ask that you:*
    - *Mute when you are not speaking*
    - *Use respectful language*
    - *Raise hand (virtually)*
    - *The Project Team will mute you and remove you from the meeting if you violate these rules*

After the presentation, the following Zoom breakout rooms became available and accessible to all participants, each staffed by a Subject Matter Expert and a facilitator.

- NEPA
- Botany and Wildlife
- Recreation and Cultural Resources
- Range and Grazing
- Renewable Energy

Feedback Summary

Through information sharing and individual conversations, it was the BLM's goal to address some of the public's concerns regarding renewable energy development and to assist stakeholders in understanding the types of information and the process under which the BLM is required to analyze proposals. Additionally, feedback was encouraged to help inform future project developers about the resource areas that are of concern and interest to the public.

Feedback forms did not contain specific questions, rather they offered the following questions for consideration when providing feedback:

- *What resource values are you concerned about?*
- *Are there locations/regions that may be desirable for alternative energy sitting? Where? Why?*
- *Are there locations/regions that are of concern? Where? Why?*
- *Is there anything else BLM should be considering in this process? Please explain.*

Feedback forms provided the following disclaimer:

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Of the 38 feedback responses received, not all passages specifically addressed resource values. Some feedback content primarily focused on a specific project or general opinions about renewable energy as a viable energy source, without any specific connection to their application on public lands.

The public meetings were outside of any formal comment period or specific project process; therefore, the following summarizes only the input received by those who submitted feedback, in a narrative format, without any statistical significance or correlation to the opinions of the meeting attendees or the broader population. It is intended to be viewed as a sampling of the potential interests and opinions of the public. For more detail, all feedback received is included in APPENDIX F.

Among the feedback received, the following themes emerged (listed alphabetically). Themes are defined as any topic area identified more than once.

- Alternative energy considerations
- Construction
- Cultural resources
- Livestock grazing
- Natural resources
- Public engagement process
- Recreation
- Screening and application process
- Siting fairness

Alternative energy considerations

Nuclear, natural gas and hydropower were offered as preferred alternatives to wind and solar. The following passages were offered for consideration regarding potential methods of energy creation:

- "Develop wind harnessing capabilities that use turbines that are much smaller/shorter and some of which do not even use blades."
- "Make sure you're staying on top of developing technology so you don't waste money on projects that will soon be obsolete."
- "Twin Falls' landfill is already working on an energy source that would provide enough for the area."

Construction

Specific feedback regarding construction were:

- Concern regarding overuse of water and gravel.
- Concern over impact to existing roads.
- Require contractors to cleanup impacted areas.
- Request to "hold contractors accountable for destruction of resources. Require contribution to a fund that can be used to mitigate damages to the environment."

Cultural resources

It was requested by multiple respondents that BLM ensure siting does not occur in protected or sacred spaces and within the viewshed of historic structures or places. Cultural resources and the spiritual significance of specific locations should factor into siting decisions. The Minidoka National Historic Site was identified as one of those locations. One respondent suggested that "culturally significant sites where development would be inconsistent with site integrity and experiences Native American cultural sites and National Historic Sites such as the Minidoka National Historic Site should have a sufficient buffer around them to protect the experience of people who value these special places."

Another respondent offered the following with regards to preservation of tribal resources, "Indigenous perspectives and traditional knowledge must guide climate-change assessment and adaptation to develop culturally appropriate strategies."

Specific to the Minidoka National Historic Site, another respondent commented, "The area around Minidoka National Historic Site is sacred ground to the Japanese American community, including Japanese Alaskans (Alaska Natives), wrongfully incarcerated there during WW II. Please advise renewable energy companies to avoid desecrating sacred ground and dishonoring Japanese American veterans."

Livestock grazing

Agriculture, specifically farming and livestock grazing, was identified by respondents as one of the most important multiple uses on BLM-managed public lands in Idaho. One respondent commented that, "grazing is protected under BLM's multiple use mandate and should not be infringed on by solar development."

Renewable energy development and its related construction impacts were described as "threats" to livestock grazing and grazing land, an important component of Idaho's economy. One respondent specifically offered opposition to any cancelation of grazing permits.

Natural resources

The preservation of Idaho's public lands for hunting, viewing wildlife and generally interacting with the outdoors was identified as an important aspect of the Idaho economy. Respondents raised concern over renewable energy impacts to natural resources, specifically:

- Migratory routes of birds and game species
- Seasonal ranges
- Disruption of habitat connectivity
- Wild horse populations
- Sensitive watersheds close to or encompassing riparian areas, wetlands, and streams.
- Specific species habitat protection for aquatic animals, bats, birds of prey, monarch butterflies, and species of greatest conservation needs. Specifically, the Greater Sage Grouse and its habitat were identified by multiple respondents as a concern.
- Impact considerations should include the cumulative impacts beyond the specific project area when migratory routes and seasonal ranges are disrupted.

One respondent recommended that "BLM develop and analyze criteria that will mitigate (avoid, minimize, or offset) adverse effects on Idaho's fish, wildlife, and botanical resources. These criteria should tier to and align with State management priorities." Carbon-capturing soil and geological features were also mentioned as natural resources to avoid.

Participants noted that site development ground disturbance has the potential to impact the aquifer and spread invasive, non-native plant species; therefore, appropriate prevention, revegetation, and monitoring should be considered in any project.

Respondents also raised concern over the impact of visual resources, mentioning that projects will have a substantial visual impact on the open landscape of Idaho. Night sky preservation should also be considered as a visual resource. Measures to minimize light pollution should be applied to projects.

Public engagement process

The following specific requests were made for the public engagement process of any project.

- Applicants should initiate robust communication and outreach with local communities as early as possible.
- Develop a citizen-based community board to represent the public interest.
- Create a mechanism for the public to report development violations and halt projects if warranted.
- Provide specific data regarding emissions reductions that will result from each project.
- Maintain full transparency in the application and development process.

One respondent commented that "community support and inclusion will be paramount to any large single-use energy development on public lands."

Recreation

Respondents identified recreation as one of the most important components of BLM's multiple uses in Idaho: "Recreation is increasingly important to Idaho's economy and recreational opportunities need to be protected."

Respondents encouraged recreation opportunities be considered within the siting development, and any recreational opportunities lost should be mitigated. Access to recreational trail riding, hiking, biking, hunting, fishing, motorized access, and enjoyment of natural habitats were specifically identified.

Screening and application process

Participants provided specific input about process requirements and screening criteria for applicants, and one requested a development moratorium until guidance is clearly defined. Another respondent suggested the development of priority locations that are pre-identified and pre-screened with "high potential for renewable energy generation and low potential for resource conflicts. Projects located in 'priority areas' should have a lower right-of-way (ROW) grant application processing fees, lower acreage rent and megawatt (MW) capacity fees, and lower performance and reclamation bonds." Exclusion areas are those that are in, near, or adjacent to special protected areas.

Additional recommendations from respondents were:

- Engage with the Idaho Governor's Office of Energy and Mineral Resources at the earliest and highest levels of planning as a cooperating agency.
- Future applicants should use the most recent state-verified data available when analyzing future project placement and effects on resources.
- The applicant should be required to consider the cumulative effects of other proposed projects in addition to their project early in the process to ensure a cohesive regional approach to development.
- Clearly define siting exclusion categories and explicitly require compliance with the Historic Preservation Act as well as consultation and coordination with Tribes and other cultural groups and Environmental Justice communities. This includes the Japanese American community associated with the Minidoka National Historic Site. This consultation and coordination should happen early in any application process, to address cultural and economic impacts to these communities.
- Collaborate with other agencies, interest groups, and community groups to identify available siting locations for potential developers outside public lands.
- Make GIS layers of resource values publicly available.
- Require applicants to disclose their investors up-front.
- Develop a clear process including priority areas and exclusion areas with overarching guidance.
- Update relevant federal land use plans (Resource Management and Travel Management Plans) that are outdated or non-existent, prior to accepting applications.

Siting and fairness

Commenters offered that already-disturbed lands (overgrazed areas, old mining areas, and areas dominated by an invasive species such as cheatgrass) should be prioritized over unimpacted lands, and siting locations should be "based on wind ratings. Designate the whole state into priority development areas based on their suitability and relevant exclusionary areas." One suggested method for achieving this is through a programmatic environmental impact statement that creates exclusion criteria for wind energy development.

Specific comments focused on concerns over increased taxes and energy transmission paths, with the request to site projects closer to where the energy is used. The following direct quotes apply to siting concerns:

- "Energy development is using Idaho lands to help Californians."
- "It is not fair to take away and damage Idaho's resources for another state."
- "Prioritize projects done by Idaho energy developers who are invested in Idaho's future and who can be held accountable."
- "This is just a way for the BLM to sell off Idaho's lands."
- "There will be conflict in any siting decision, but the BLM should prioritize siting decisions that allow economical wind and solar resources that are closest to transmission line infrastructure in areas that do contain relatively fewer conflicts.

Appendix A

News Release

News Release

BLM Idaho State Office
Media Contact: Caleb Ashby, 208-373-4021 or cashby@blm.gov
Feb. 16, 2023

BLM seeks public input on renewable energy strategy in southern Idaho

Boise, Idaho—The Bureau of Land Management is inviting the public to open house meetings that will outline the process for a strategic, landscape-scale approach to respond to increased interest in renewable energy projects proposed on public lands managed by the BLM in southern Idaho. The goal of the meetings is to gather feedback, increase partner engagement, explain how BLM processes applications, and highlight the many multiple uses of public lands. Information received will be summarized in a public report for renewable energy developers to use when considering projects on public land.

BLM will host in-person and virtual open house meetings from 5-7 p.m. MST on the following dates. Each meeting will begin with a BLM presentation after which participants will be able to speak one-on-one with BLM staff stationed throughout the venue, or in breakout rooms during the virtual session, to ask questions and provide feedback. Please contact us for reasonable accommodations to participate.

Meeting Dates:

Feb. 22, 2023: Hilton Garden Inn, 700 Lindsay Blvd., Idaho Falls, ID 83402
Feb. 23, 2023: Canyon Crest Event Center, 350 Canyon Crest Dr., Twin Falls, ID 83301. This session is scheduled to coincide with the Lava Ridge Wind Project draft review period public meeting to allow participants to attend both events.
Feb. 27, 2023: Courtyard by Marriott, 1789 S. Eagle Rd., Meridian, ID 83642
March 6, 2023: virtually via Zoom. Registration required at https://bit.ly/3J8ne4h.

“As a responsible steward of America’s public lands, we look forward to sharing information on what steps the BLM will take when we receive future applications,” says **BLM Idaho State Director Karen Kelleher**. “We want to hear from our stakeholders, public, and Tribal partners about their perspectives on the renewable energy application and project evaluation processes, as well as what other factors or data the BLM should consider, as we continue to receive and process proposed projects.”

The BLM manages vast stretches of public lands that have the potential to make significant contributions to the nation’s renewable energy portfolio. Renewable energy projects on our nation’s public lands support the Biden-Harris administration’s goal of a carbon pollution-free power sector by 2035, as well as Congress’ direction in the Energy Act of 2020 to permit 25 gigawatts of solar, wind and geothermal production on public lands no later than 2025. Several companies have expressed interest in developing renewable energy projects on BLM-managed public lands in southern Idaho, because the lands are near existing and planned transmission infrastructure.

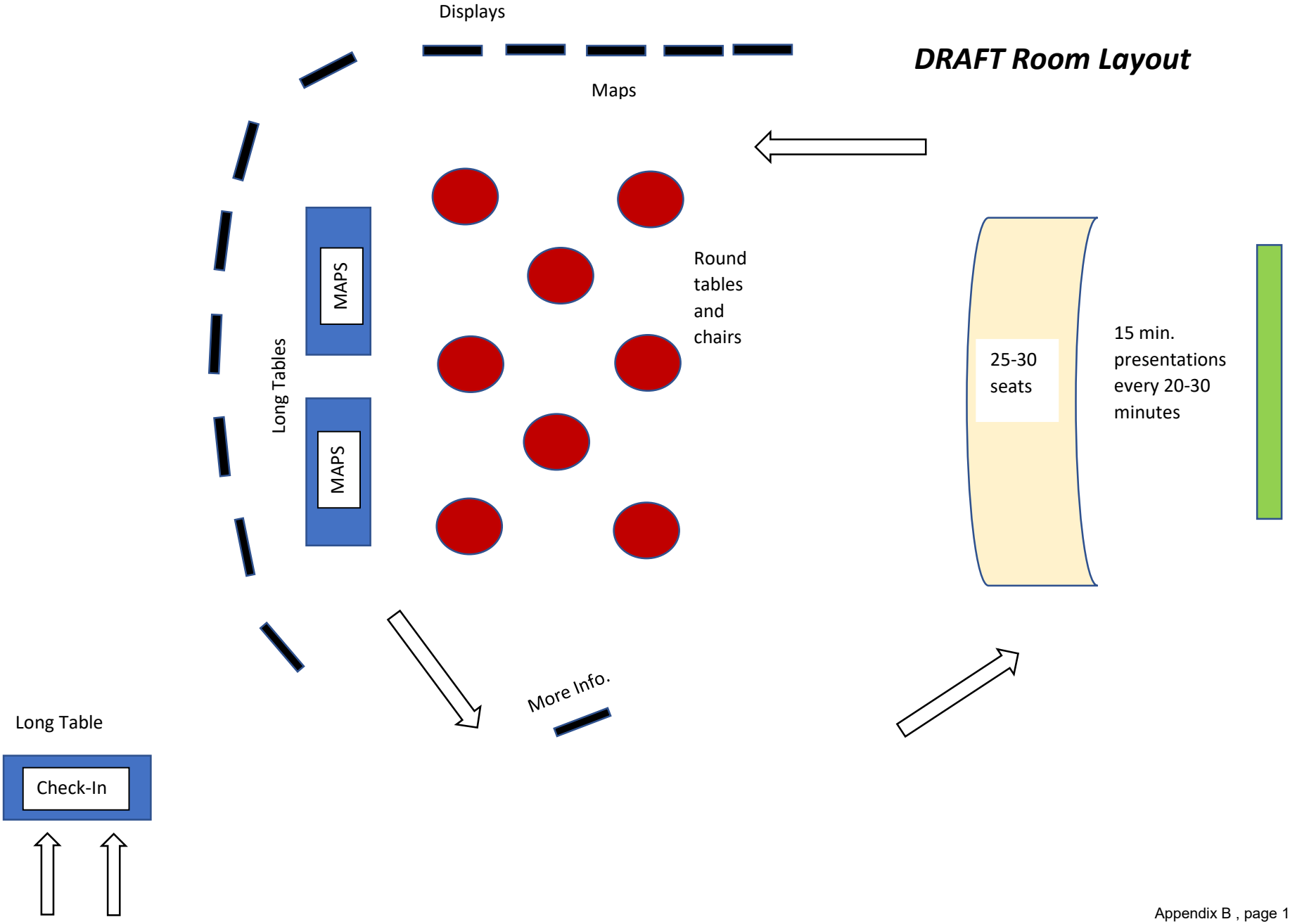
-BLM-

The BLM manages more than 245 million acres of public land located primarily in 12 western states, including Alaska, on behalf of the American people. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. Our mission is to sustain the health, diversity, and productivity of America’s public lands for the use and enjoyment of present and future generations.

Follow BLM Idaho on Twitter, Facebook and Flickr @BLMIdaho

Appendix B

Room Layout


Displays
DRAFT Room Layout
Maps
MAPS
MAPS
Long Tables
Round tables and chairs
25-30 seats
15 min. presentations every 20-30 minutes
More Info.
Long Table
Check-In

Appendix C

Frequently Asked Questions Handout

U.S. Department of the Interior
Bureau of Land Management

FREQUENTLY ASKED QUESTIONS
BLM Idaho – Renewable Energy Strategy Public Open House

The Bureau of Land Management (BLM) Idaho, in collaboration with our land management partners and the public, is refining our approach to processing applications to assist companies before they propose renewable energy projects on public lands in southern Idaho. Because of the increased interest in renewable energy, by looking at a landscape-scale strategy, proposals can be focused on areas that are more viable, where necessary energy production resources are available, but where there are also few multiple-use conflicts. In doing so, applicants will have the tools necessary to propose more environmentally responsible projects, which will increase the efficiency of the application process and reduce impacts to resources and other public land users.

What is the intent of today's public meeting?

- Assist in in understanding how the BLM processes renewable energy applications, identify areas with resource conflicts for consideration by applicants, and inform the public how they can participate in the analysis.
- Enhance understanding and correct misinformation regarding the BLM's responsibilities as a federal multiple-use land manager.
- Ensure that the renewable energy application process is communicated consistently to stakeholders, as well as to industry.

What will you do with the feedback provided at today's meeting?

Feedback received at four public meetings in Twin Falls, Idaho Falls, Meridian and online, will be collected in a summary document designed to assist companies proposing renewable energy projects that are both environmentally sound and economically feasible. This summary document will be available at **https://www.blm.gov/idaho-renewable-energy-strategy** by **May 1, 2022**.

Can I provide feedback after the meeting?

BLM will always accept public input; however, this is not an official commenting period and it is preferred that input relevant to the state's renewable energy strategy be provided as soon as possible to generate a summary document by May 1, 2023, that can be provided to future energy applicants at their pre-application meetings. The preferred method for submitting feedback is online at **bit.ly/blm_idaho.**

How is the proposed Lava Ridge Wind Project involved in this process?

When the Lava Ridge Wind Project in south-central Idaho was proposed in 2018, it was the only renewable energy application received by BLM Idaho. Today, the BLM Boise and Twin Falls Districts are in the process of consulting with on several potential renewable energy projects on public lands. The Idaho Renewable Energy Strategy will not interrupt the processing of the Lava Ridge Wind Project. Rather, the results of the strategy will inform future applicants, moving forward.

How will the summary document help future renewable energy applicants in their decision making?

In addition to assessing potential challenges that may arise, the summary will provide interested parties with an opportunity to conduct further research on issues specific to their proposed projects. They may decide to proceed, explore alternative locations, conduct further outreach, or reconsider entirely. If an interested party moves forward with their application, they must address the following factors, as applicable, in the Renewable Energy Factors Analysis Report (see reverse).

Renewable Energy Factors Analysis Report

1. The availability of lands that could meet the applicant's needs, including access to transmission.
2. Conformance with decisions in current land use plan(s) as amended (e.g., visual resource management class designations and seasonal restrictions), including 2015 sage-grouse plan amendments or successor land use planning decisions.
3. Coordination with other Federal agencies and state and local (county and/or municipal) governments, including consideration of consistency with officially adopted plans and policies (e.g., comprehensive land use plans, open space plans, and conservation plans) and permit requirements (e.g., special use permits).
4. Financial and technical capability of the applicant, including, but not limited to, the following: • International or domestic experience with renewable energy projects; and • Sufficient capitalization to carry out development, monitoring, and decommissioning, including the preliminary study phase of the project and the environmental review and clearance process.
5. Potential resource or user conflicts and proposed measures or design features to address adverse impacts, including, but not limited to:
a) Public access and recreational opportunities on public lands (including hunting, fishing, and other fish- and wildlife-related activities).
b) Other authorized uses or valid existing rights in the project area (e.g., other permits, leases, ROWs, and associated infrastructure).
c) ESA-listed or special status species and their habitats.
d) Important fish and wildlife habitats and migration/movement corridors.
e) Air and water quality standards.
f) Lands with wilderness characteristics and associated scenic, recreation, and wildlife habitat values.
g) Lands donated or acquired for conservation purposes, or mitigation lands identified in previously approved projects.
h) Resources or uses of neighboring lands with special designations managed by the BLM or other Federal, state or local agencies.
i) Other resources or uses identified by the BLM during the pre-application meeting or preliminary application review meeting.
6. Capacity of existing and new transmission infrastructure and use of or need for existing and new transmission and transmission interconnection facilities.
7. Access needed for construction, operations, maintenance, and termination, including use of existing roads.
8. Efficient use of the land considering the solar or wind resource, the technology to be used, and the proposed project layout.
9. Water needed for project construction, operations, maintenance, and termination; potential impacts to surface and groundwater; and proposed measures to address such impacts.
10. If applicable, special circumstances associated with an application such as an expansion or repowering of an existing project or unique interagency partnership.
11. If applicable, opportunities to combine Federal and nonfederal lands for optimum siting (e.g., combining BLM-administered land with adjacent previously disturbed private lands).
12. If applicable, location in relation to previously contaminated or disturbed lands such as brownfields; mechanically altered lands such as mine-scarred lands and fallowed agricultural lands; idle or underutilized industrial areas; lands adjacent to urbanized areas and/or load centers; or areas repeatedly burned and with limited probability of restoration.
13. Potentially affected Department of Defense facilities and airspace, potential conflicts, and proposed measures to address such conflicts.
14. Compliance with FAA requirements.

Appendix D

Feedback Form

Renewable Energy Strategy Open House

Please provide your feedback in the online form at: bit.ly/blm_idaho. You may also submit this handwritten form at tonight's meeting. Please submit feedback by March 10, 2023.

A summary of public feedback will be available at https://www.blm.gov/idaho-renewable-energy-strategy by May 1, 2023.

The Bureau of Land Management Idaho State Office appreciates your feedback by March 10, 2023. Subject Matter Experts are stationed around the room to answer questions and provide information. The following questions are for your consideration when providing feedback:

- What resource values are you concerned about?
  Applicants factor analysis list available at https://www.blm.gov/idaho-renewable-energy-strategy.
- Are there locations/regions that may be desirable for renewable energy siting? Where? Why?
- Are there locations/regions that are of concern? Where? Why?
- Is there anything else BLM should be considering in this process? Please explain.

Feedback

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Renewable Energy Strategy Open House

Feedback

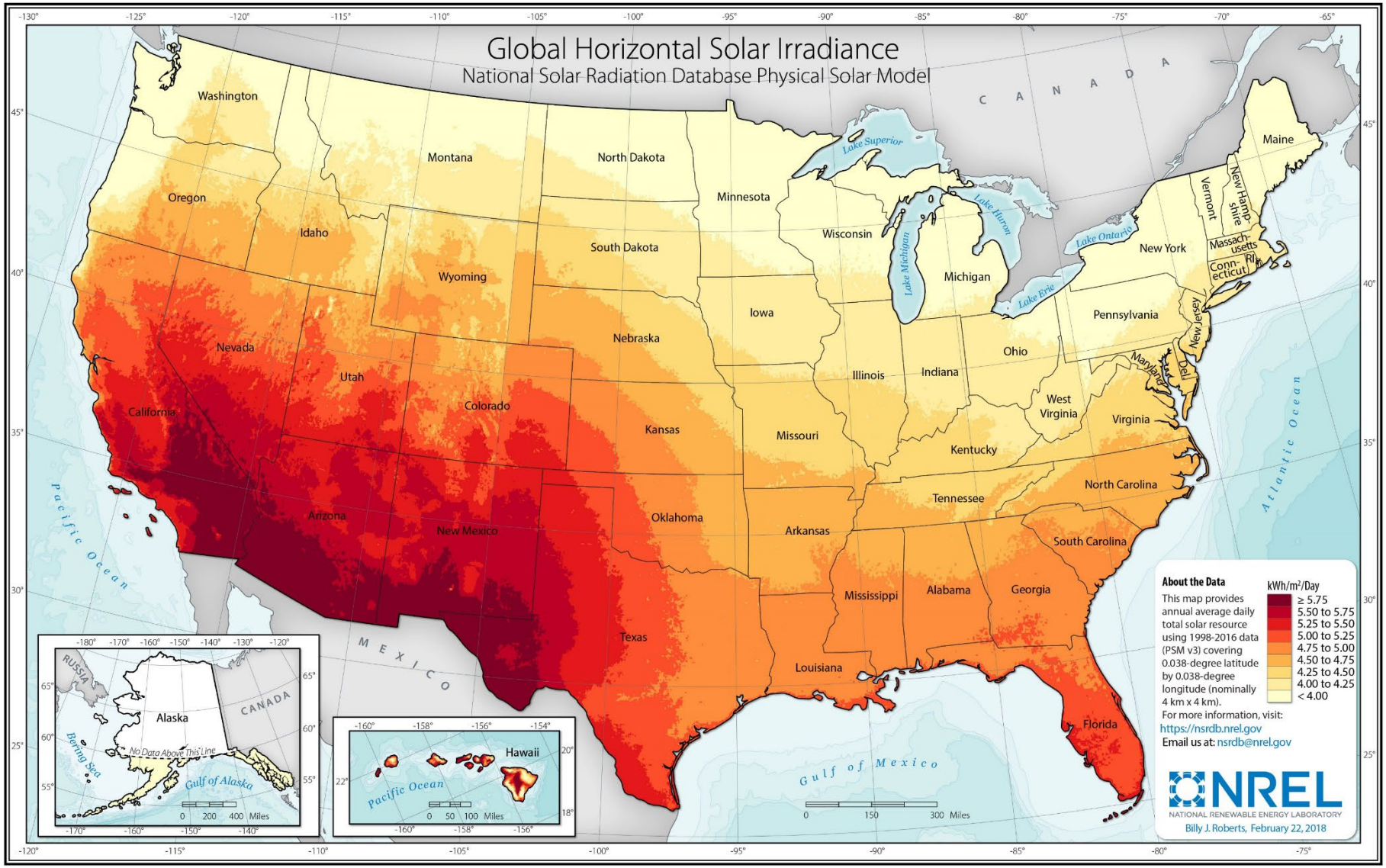
Appendix E

Presentation

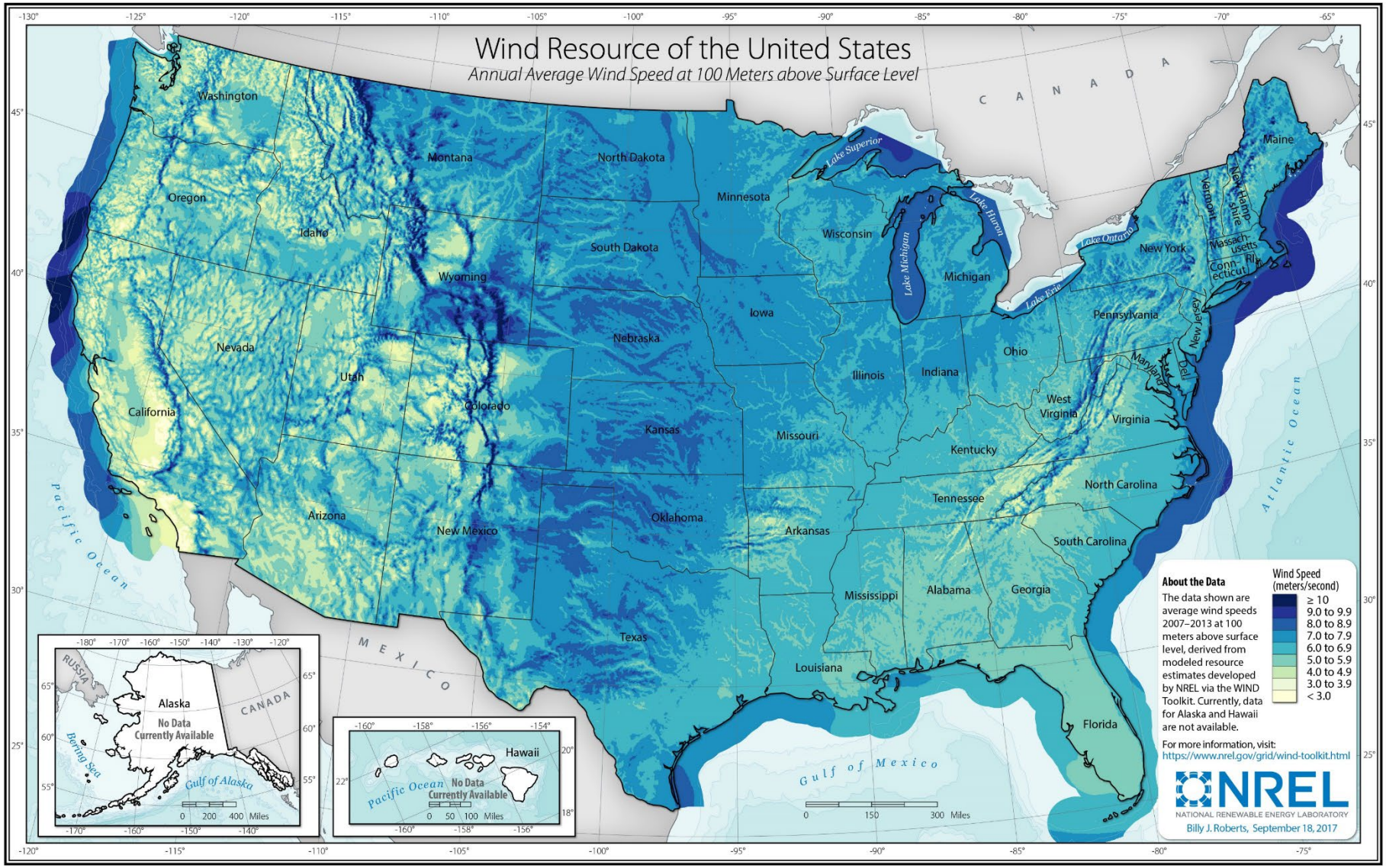
U.S. Department of the Interior
Bureau of Land Management

Renewable Energy on BLM Idaho-Managed Public Lands

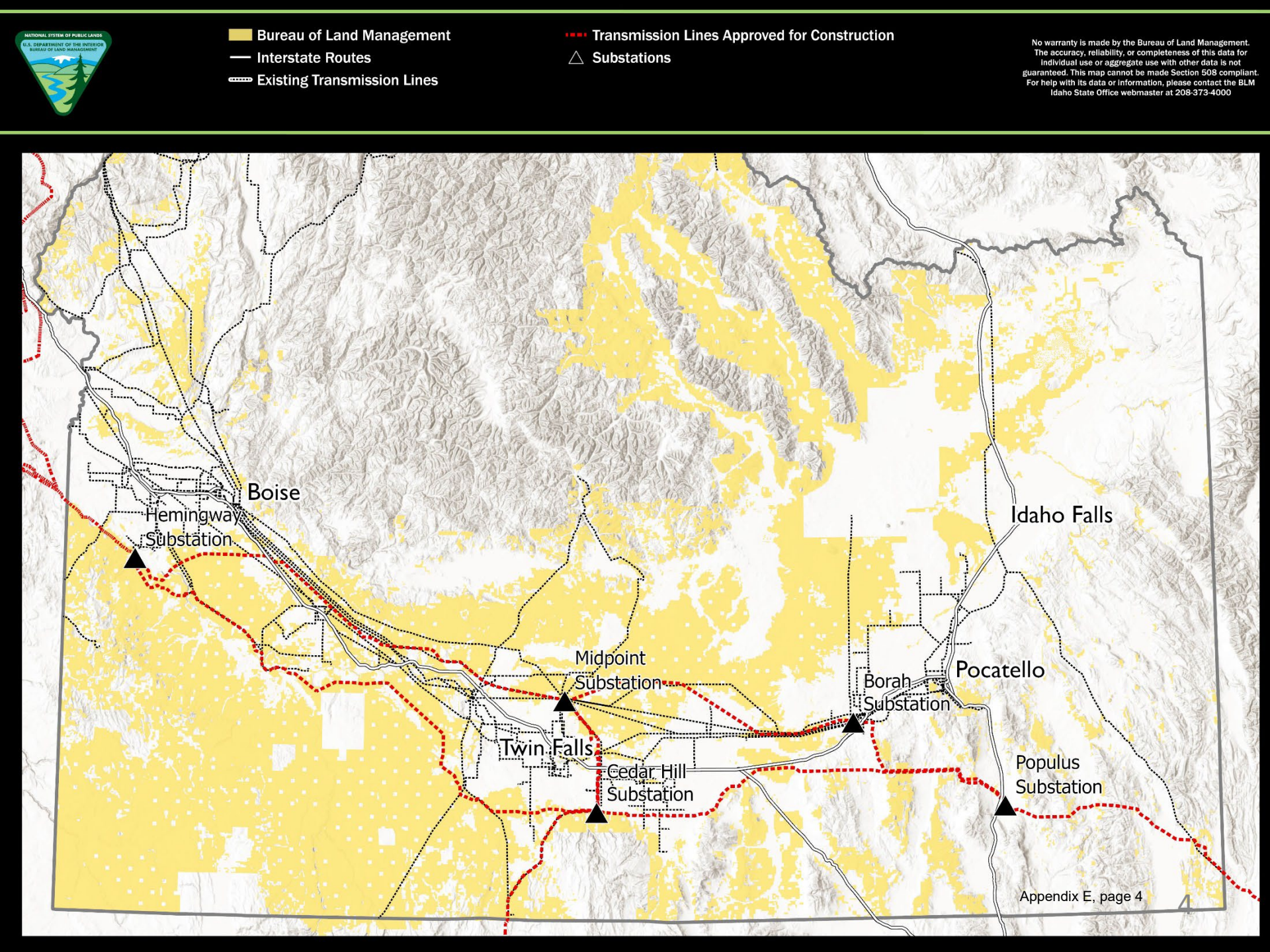
The Bureau of Land Management's mission is **to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations**.



https://www.nrel.gov/gis/solar.html



https://www.nrel.gov/gis/wind.html


Bureau of Land Management
Interstate Routes
Existing Transmission Lines
Transmission Lines Approved for Construction
Substations
No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of this data for individual use or aggregate use with other data is not guaranteed. This map cannot be made Section 508 compliant. For help with its data or information, please contact the BLM Idaho State Office webmaster at 208-373-4000
Boise
Hemingway Substation
Idaho Falls
Midpoint Substation
Pocatello
Borah Substation
Twin Falls
Cedar Hill Substation
Populus Substation

Backdrop

The BLM's core mission, as defined by the Federal Land Policy and Management Act of 1976 (FLPMA), is one of managing our public lands under the principles of multiple use and sustained yield.

Title V of FLPMA states that the Secretary is authorized to grant, issue, or renew rights-of-way for systems for generation, transmission, and distribution of electric energy.

BLM Idaho Renewable Energy Strategy

Key objectives:

- **Consistency / Efficiency**: Enhance consistency and workflow efficiency in application processing
  - For both BLM and project applicants

- **Prioritization:** Inform the framework for prioritizing the order in which applications are processed

- **Communication**: Facilitate communications and engagement with partners and the public

Wind/Solar Application Process

Stage 1:
Pre-application

Stage 2: Application

Early engagement ★ → Stage 3: Pre-NEPA Assessment

Scoping period
Public comment period ★ → Stage 4: NEPA & Range of Alternatives

Renewable Energy Factors Analysis Report

Examples – *not comprehensive*:

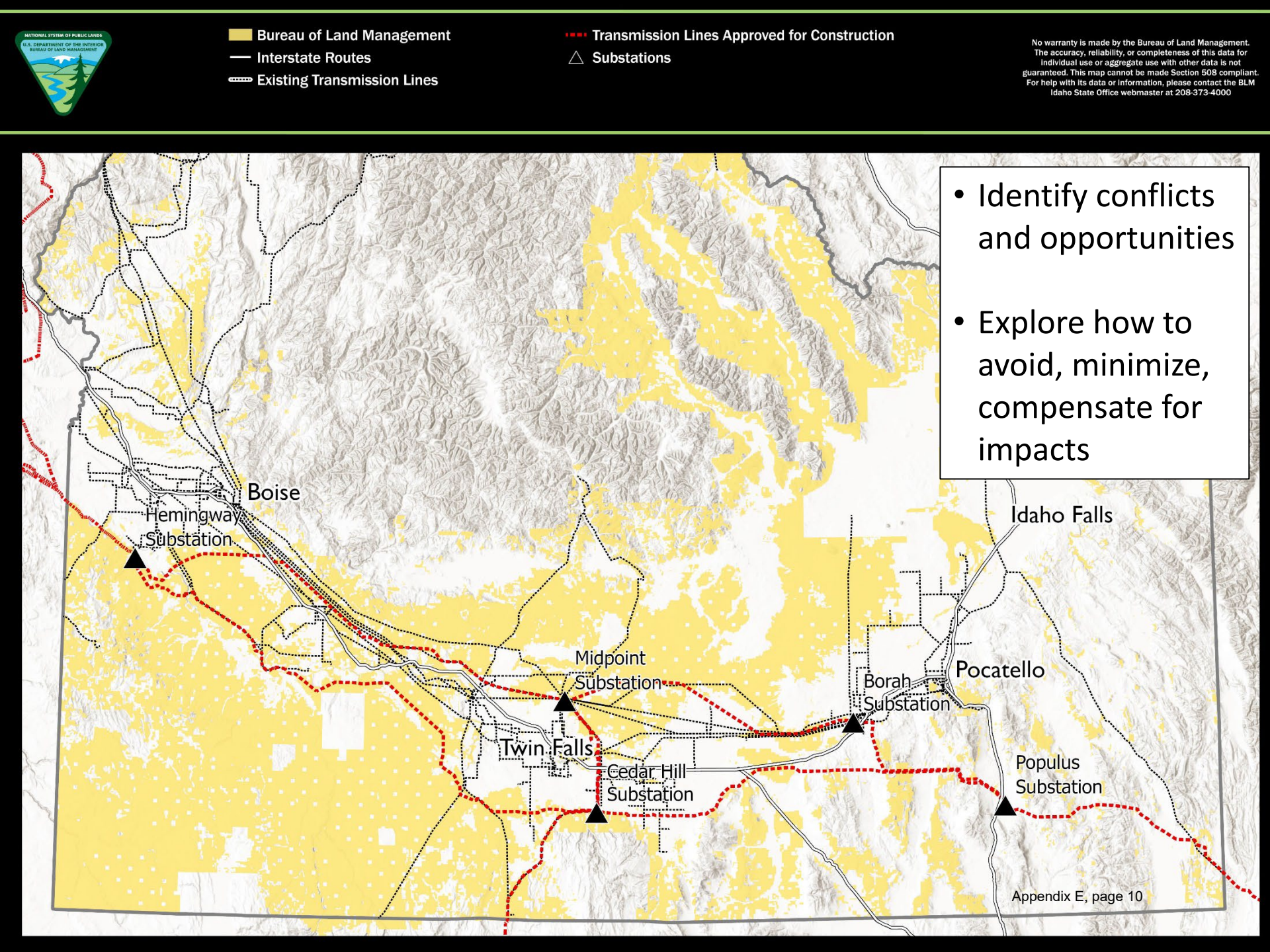
- Conformance with land use plan decisions
- Cultural and archaeological resources
- Tribal/Federal/State/local coordination and consideration of additional permit or regulatory requirements
- Impacts to grazing, recreation, and other authorized uses
- Impacts to fish and wildlife, habitats, and migration corridors
- Water usage and impacts
- Access to transmission and interconnection facilities

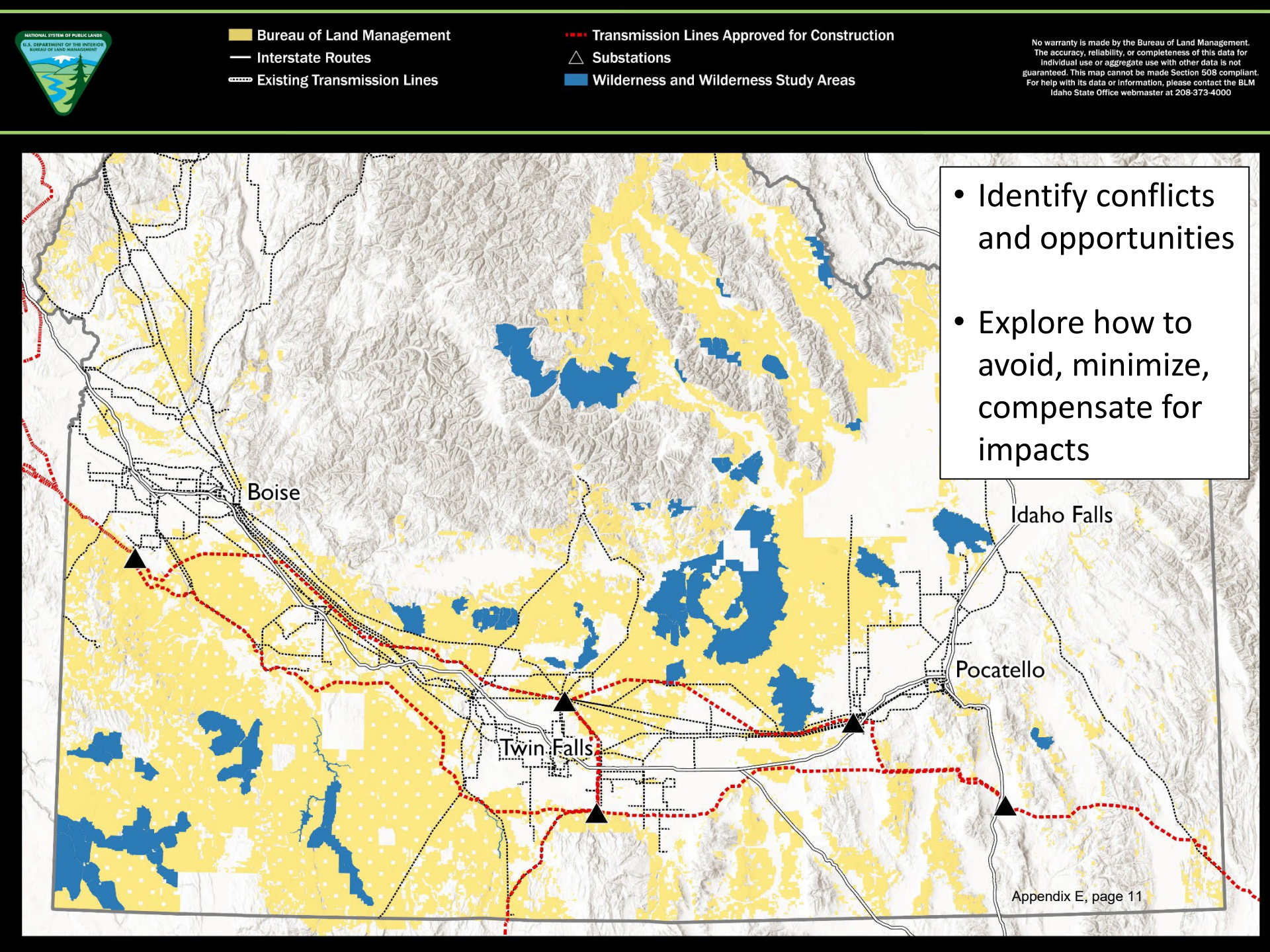
Renewable Energy Factors Analysis Report

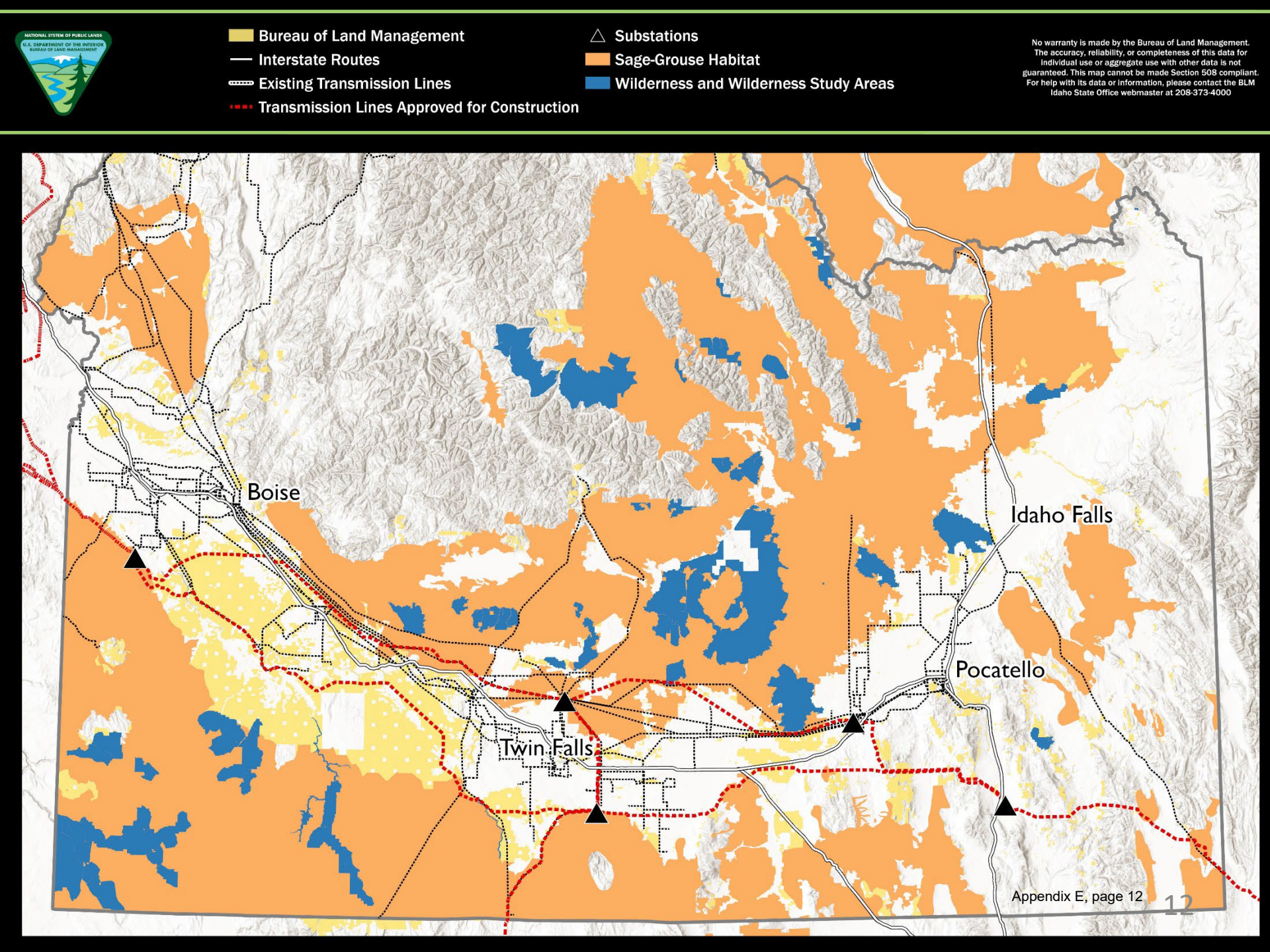
We developed a structured method for the applicant to document the requirement to:

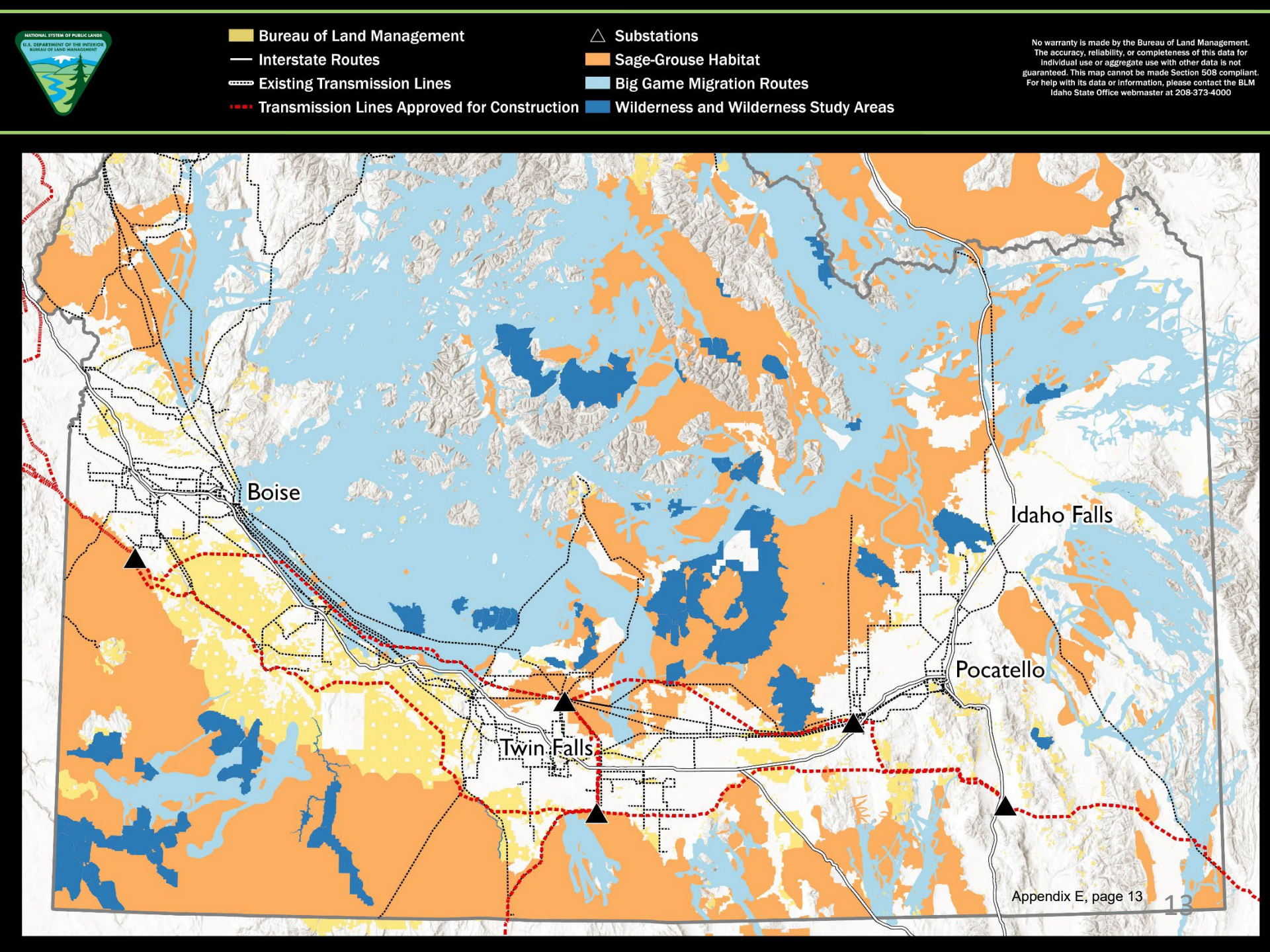
"Address all known potential resource conflicts with sensitive resources and values, including special designations or protections, and include applicant-proposed measures to avoid, minimize, and compensate for such resource conflicts, if any"

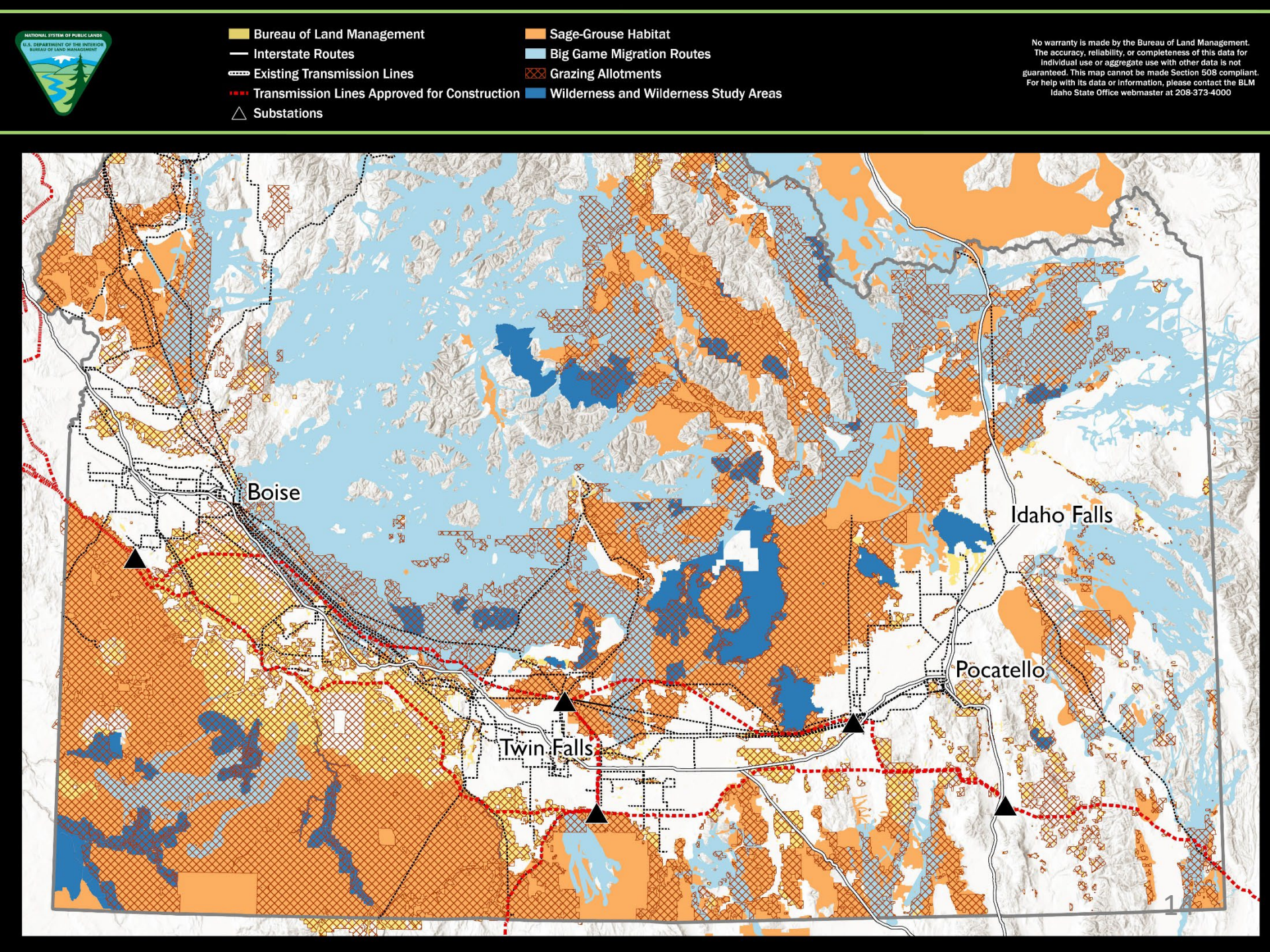
43 CFR 2804.12(b)(2)


Bureau of Land Management
Interstate Routes
Existing Transmission Lines
Transmission Lines Approved for Construction
Substations
No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of this data for individual use or aggregate use with other data is not guaranteed. This map cannot be made Section 508 compliant. For help with its data or information, please contact the BLM Idaho State Office webmaster at 208-373-4000
• Identify conflicts and opportunities
• Explore how to avoid, minimize, compensate for impacts
Boise
Hemingway Substation
Idaho Falls
Midpoint Substation
Borah Substation
Pocatello
Twin Falls
Cedar Hill Substation
Populus Substation
Appendix E, page 10


Bureau of Land Management
Interstate Routes
Existing Transmission Lines
Transmission Lines Approved for Construction
Substations
Wilderness and Wilderness Study Areas
No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of this data for individual use or aggregate use with other data is not guaranteed. This map cannot be made Section 508 compliant. For help with its data or information, please contact the BLM Idaho State Office webmaster at 208-373-4000
• Identify conflicts and opportunities
• Explore how to avoid, minimize, compensate for impacts
Boise
Idaho Falls
Pocatello
Twin Falls
Appendix E, page 11


Bureau of Land Management
Interstate Routes
Existing Transmission Lines
Transmission Lines Approved for Construction
Substations
Sage-Grouse Habitat
Wilderness and Wilderness Study Areas
No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of this data for individual use or aggregate use with other data is not guaranteed. This map cannot be made Section 508 compliant. For help with its data or information, please contact the BLM Idaho State Office webmaster at 208-373-4000
Boise
Idaho Falls
Pocatello
Twin Falls


Bureau of Land Management
Interstate Routes
Existing Transmission Lines
Transmission Lines Approved for Construction
Substations
Sage-Grouse Habitat
Big Game Migration Routes
Wilderness and Wilderness Study Areas
No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of this data for individual use or aggregate use with other data is not guaranteed. This map cannot be made Section 508 compliant. For help with its data or information, please contact the BLM Idaho State Office webmaster at 208-373-4000
Boise
Idaho Falls
Pocatello
Twin Falls


Bureau of Land Management
Interstate Routes
Existing Transmission Lines
Transmission Lines Approved for Construction
Substations
Sage-Grouse Habitat
Big Game Migration Routes
Grazing Allotments
Wilderness and Wilderness Study Areas
No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of this data for individual use or aggregate use with other data is not guaranteed. This map cannot be made Section 508 compliant. For help with its data or information, please contact the BLM Idaho State Office webmaster at 208-373-4000
Boise
Idaho Falls
Pocatello
Twin Falls

BLM Idaho Renewable Energy Strategy

Questions to consider as you provide your feedback:

- What resource values are you concerned about?
- Are there locations/regions that may be desirable for renewable energy siting? Where? Why?
- Are there locations/regions that are of concern? Where? Why?
- Is there anything else BLM should be considering in this process?

Appendix F

Feedback

Appendix F: Feedback

Feedback Forms

The following are transcribed from feedback forms and emails as they were submitted without modification, except names and contact information of private residents.

In addition, per Department of the Interior Policy 386 DM 3, DOI Web Standards Handbook, Section 3.4, links to non-federal websites have also been removed. The Bureau of Land Management reserves the right to deny or remove any link that is determined to conflict with DOI and/or the bureaus' mission or policies. Furthermore, any reference to non-federal sites does not signify an endorsement or prioritization of the content, views, products, or services provided by those sites.

The views expressed by members of the public do not reflect the official views of the BLM or the U.S. government nor does the BLM guarantee the accuracy of such information provided.

Feedback From: Private Resident

To BLM Idaho Office:
I believe that first and foremost any green energy projects that are going to be constructed on BLM ground need to be on areas that are already highly disturbed by humans. This would include areas that are severely overgrazed where the plant understory and natural food chain is already compromised, or areas where mining and other human activities have previously disturbed the soils and wildlife significantly. Also I would like to see future green energy projects that are low profile in regards to their obstruction of our beautiful long distance views of scenery and mountains. This would exclude tall windmills which I believe ruin views for miles. I live in Idaho because I can see the mountains from miles away and watch the sunset unobstructed by manmade structures.

I am not opposed to solar energy as long as it is done responsibly and with cooperation from the nearby landowners. Also I have heard that they are developing wind harnessing capabilities that use turbines that are much smaller/shorter and some of which do not even use blades. These would also be acceptable to me if kept within a reasonable land area footprint.

I recently saw a presentation by Idaho Power on some of the green energy options they are working toward. One of the very viable options was installing pumps at the bottom of current hydro power plants so that the water can be pumped back into the reservoir from the bottom of the dam and run through the power plant multiple times. This seemed a very reasonable and responsible way to generate more green power.

Lastly and very importantly, I would like the BLM in Idaho to give preference to projects proposed by Idaho Power or other Local energy companies that have an investment in Idaho's future and will be around in 15 to 20 years when these projects need to be repaired, reworked, torn down, etc. Idaho Power has a 110 year proven track record of working with Idaho citizens to meet their energy needs in an environmentally responsible way. We should be working with companies that can be held accountable when something goes wrong or isnt working, companies that are going to not only construct their green energy project but also operate it after construction and be a part of the local community. A large and distantly located invesment company that is only part of the construction is to me unacceptable as they have no longterm concerns with whether the project is viable and or has major longterm environmental effects. Thank you for your time and consideration,

Feedback From: Private Resident

I forgot in my previous comment to say thank you for the public open house in Twin Falls. I thought the presentation by Jarod Blades was very well executed, brief but very informative. Thank You all who organized this.

Feedback From: Private Resident

The Link for "Idaho Wind Maps and Charts" at the bottom of this webpage: https://www.blm.gov/programs/energy-and-minerals/renewable-energy/strategy/idaho#:~:text=Idaho%20Renewable%20Energy%20Strategy%20The%20Bureau%20of%20Land,lands%20managed%20by%20the%20BLM%20in%20southern%20Idaho. is only available for internal BLM access. Is it possible to make these maps and charts publicly available online?

Feedback From: Private Resident

Hello - not sure if this is relevant but public use of the land (hiking, biking, sightseeing). To integrate that use into site applications would be nice.

Feedback From: Private Resident

Thank you for the opportunity to provide comments on the BLM's Renewable Energy Strategy for Idaho. As a native Idahoan and witness to the "land rush" of wind and solar energy projects in southern Idaho, I agree there is a vital need for a plan that establishes application guidelines for companies, in addition to outlining responsibilities for the BLM in ensuring the best use of public lands and the protection of sensitive natural and cultural resources or, in some cases, perhaps, the rejection of an application for use of public lands.

1. What resource values are you concerned about?
   The Renewable Energy Factors Analysis Report includes some very positive suggestions for the responsible use of public land for energy projects. I like the idea that applicants would have to review the items listed with the BLM in order to become aware of potential project impacts on wildlife and their habitats, any Endangered Species or special status species and their habitats, migration routes, sensitive resources, viewscapes, available water, uses of neighboring areas that may have special federal designation of some kind, and public access / uses of the land. Although #5-h on list refers to "Resources or uses of neighboring lands with special designations managed by the BLM or other Federal state or local agencies", I respectfully suggest including specific language that refers to Tribal use of the land, as well as use by other ethnicities, in addition to the safeguards required to protect Treaty Rights / general rights afforded cultural groups associated with federally designated lands, i.e., a National Historic Site.

   Also, a guideline for songbirds, raptors, and their respective flyways should be included in the list or mentioned with the entries on wildlife. I appreciate guidelines 1,2, and 3 that concern the applicant and their familiarity with public lands that might be available for a proposed project, plus the Federal, state and local land use plans, local policies and permits. Of special significance, I feel, is 4, which requires the applicant to provide its financial background, project experience, and the financial requirements for all phases of the project. One thing not listed is requiring notice to the public of the project's investors. If a company wants to benefit from use of public lands that are supported by taxpayers, it only seems fair to require the company to inform the public of a project's investors, foreign and domestic.

   Items 11 - 13 relate to the siting of the proposed project. In my opinion, it is very appropriate to ask applicants to locate their project on brownfields, unused industrial land, disturbed lands or to utilize a combination of Federal and non-public lands that have been disturbed. In fact, implementing this "Smart from the Start" strategy would be a positive step in minimizing impacts to the natural and cultural resources on public land. This could be strengthened by adding another guideline that encourages construction of energy projects close to the area/communities needing power (distributive generation), which would limit the need and the adverse impacts of

transmission lines carrying power from wind or solar farms hundreds or even thousands of miles away.

2. Are there locations/regions that may be desirable for renewable energy siting? Where? Why?
   As mentioned above, locating projects on land that is damaged, disturbed, fallow, or abandoned and on land that is close to the communities in need of the energy would be preferred to using public land with its multiple uses. Within community settings, solar panels could be placed on the rooftops of new housing developments, warehouses, shopping malls, stadiums, schools, downtown businesses, and parking lots. Barns, machines sheds, feedlot covers, granaries, crop storage buildings, and the outside perimeters of farm fields offer possibilities for solar panels in rural settings. Public land should be a last choice for energy projects. Perhaps the BLM could even collaborate with other agencies, environmental groups, or community groups in making a guide that lists available brownfields, disturbed properties, fallow farmland, etc. for energy project applicants to examine before even considering public land. Recently, the Region IV Development introduced a "Brownfield Revitalization Project" for eight counties in South Central Idaho that could serve as a resource for individuals and companies alike (KMVT/KSVT, 3 March 2023). One of their goals with this program is to "help preserve green spaces" through the reuse of abandoned properties. I believe this could become quite an important program if policies of distributive generation are adopted by communities to augment their locally produced clean energy, reducing the need to import energy from distant locations and the need to locate huge projects on open spaces/public lands.

3. Are there locations/regions that are of concern? Where? Why?
   I have concerns about the large, open areas of high desert (public lands) across southern Idaho that support a variety of wildlife, sage, shrubs, grasses, unique geologic features, avian species, insects, and reptiles, resources that provided a means of subsistence over thousands of years for indigenous groups, and multiple uses in more recent decades for southern Idaho residents and visitor. The biodiversity of the steppe deserts creates an amazing environment, one that should not be altered by the siting of multiple, massive renewable energy projects. By allowing such large-scale projects, wildlife migration routes, habitats, carbon-capturing soils, and geologic features are impacted in a long-lasting and sometimes irreparable way. Besides, wind ratings for this area indicate a region of mostly fair winds. It seems that the wind energy companies would prefer areas with better wind ratings, such as the region from Texas northward to Nebraska, a "wind belt."

4. Is there anything else BLM should be considering in this process?
   With the numerous applications for energy projects submitted of late, the BLM should consider placing a moratorium and/or limits on the applications until a strategy can be established with solid guidelines. Should the many projects for wind and solar farms

be allowed, the cumulative effects will be devastating to the way of life in southern Idaho as we know it today. The lands with multiple uses may become the lands with mono-uses---wind energy or solar energy, void of the natural and cultural resources the public currently enjoys.

Finally, the BLM should stay informed on up-and-coming technology in the renewable energy industry to avoid signing on to projects that may become obsolete soon after beginning operation. Technology, such as nuclear fusion, could soon be implemented for producing energy without the extensive destruction of resources that commonly happens with wind farms, and on a much smaller amount of land for a project area.

Respectfully,

Feedback From: Private Resident

We have carefully researched the BLM website as we considered our input regarding future wind turbine applications for BLM land use.

The BLM Mission statement: The Bureau of Land Managements mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations. This in our opinion this is the overriding reason that the industry wind turbine farms should not be located on public land in Idaho.

We reviewed the NEPA application process. Many of the requirements cannot be fulfilled by the wind turbine industry. Most specifically number 5 A-I.

We also looked into the Sage Grouse information provided by BLM website. It states "The BLM responsibility for 68 million acres of sage brush habitat more than any other surface managed in the US. Gives the agency a leading role in efforts to reverse declines in sage grouse populations. With partners at the State and local levels the agency is working to safe guard the landscape which Greater Sage Grouse and more than 350 other species rely on. Under it's mandate the multiple use and sustained yield the Bureau, also manages these lands for the present and future benefits of people who rely on them to support their livehoods and traditions. More than 70 resource management plans "RMPs " guide these efforts.

*Healthy vegetation is the grouse's best defense against predators. And wind turbine farms will destroy the vegetation for many years to come. The proposed wind turbine farms are too large for our public lands, At the meeting held in Twin Falls, on Feb 23rd 2023 a map of Idaho was shown, each over lay represented reason after reason why the land was unavailable from mountainous areas to wildlife migration, etc. Since you have carefully mapped this out, why is it being subjected to change at this time? The proposed wind turbine areas are huge, and out weigh the lands ability to support them. Foundations for the wind turbines are 10-20 feet thick, 60 + feet in diameter weigh almost two million pounds, and use 40 truckloads of concrete. The land is fragile, much of it is over our aquifer, which is comprised of lava tubes, rivers, lakes which will all be disturbed. There are no guarantees that the domestic and agricultural waters will remain unaffected. Not to mention the Snake River canyon, the dams and irrigation systems located nearby would also be put in jeopardy.

The wildlife will be severely affected your mission statement, and sage brush protection plan will have to be scrapped since it will not be able to sustain the onslaught of the wind turbines. As Governor Cecil Andrus said," Idaho is too great to litter" and that is what wind turbines in Idaho will do. Litter our public lands, to provide power to areas who don't want wind turbines on their public lands. Look to your protocols already in place and the answer to future proposals will be evident.

Feedback From: Private Resident

Lava Ridge
I am absolutely opposed to the wind project at Lava Ridge.
My concerns:

The 300 square miles that will forever change the multi-use character of the area is much too intrusive. The wildlife concerns with deer, elk, antelope, and birds is far too damaging. Disruption of the valuable aquifer beneath the project due to construction and blasting. Water depletion during the construction phase is extremely damaging especially during the drought.

The lifespan of the units and the disposal problems of them is a concern. We could accomplish our energy goals much more efficiently and with fewer issues using abundant natural gas and new nuclear options.

Feedback From: Private Resident

Please expand the mapping layers. Please show all known bird migration routes and conduct systematic studies to determine migration routes.

Please act to protect ALL remaining juniper forests - as BLM and fires have caused catastrophic loss to juniper and PJ species own the West. Please provide a layer with all known and currently proposed private land wind/solar.renewable facilities shown. There is already nearly a wall of wind turbines all across Snake River Plain that may be resulting in major "take" of migrating birds - as this is the low elevation landscape. that may be essential during storm situations.

Please provide mapping of all existing sensitive species occurrences. for example, long-billed curlew and/or burrowing owl may be seriously impacted by siting energy projects in "degraded" areas.

Feedback From: Private Resident

We need recent documentation not outdated sources used in draft EIS studies. Seismic Phenomena and infrasound needs to be addressed in Draft EIS.

Not all states have the same grazing AUM's per acre so more fruitful grazing areas are impacted more.

Foreign investors that use the citizens of the USA public lands to develop green energy projects at the tax payers expense should not be allowed. I.e. pattern energy is a Canadian company CPP investors.

NEPA process is not offered in multiple languages or for the deaf and blind Rural Gentrification is a violation of underserved populations Multi use public lands lose being multi use by wildlife, hunters, photographers, UTV use, and natural unaltered space when commercial scale green energy projects are allowed.

Investment corporations have a conflict of interest when they choose who does their environmental studies. They become subjective instead of objective. Unsafe zones or trespass zones around wind turbines limit safe public use of land and if close to private land owners violate private property rights Commercial scale green energy projects in isolated rural areas are vulnerable to attacks that can leave our grid system in peril.

Fugitive dust with all the blasting and /or pile driving can harm crops or block vision on nearby roads from dust storms

Feedback From: Private Resident

I support the proposed Pre-National Environmental Policy Act (NEPA) Assessment Process for Wind and Solar Energy Development Applications because I believe it will save time for both applicants and BLM staff. I am curious if the BLM has a list of all the layers are using so far in the mapping process. I did not see anything mentioned about wild horse herd management areas or visual resource management classes. Maybe I missed it. Finally, I am wondering if BLM offices throughout the state have installed rooftop solar. If not, they should. Rooftops may be the only BLM-administered areas in Idaho where renewable energy projects will not be controversial.

Feedback From: Private Resident

Public lands are areas of land and water that are owned collectively by U.S. citizens and managed by government agencies. I am concerned about all the resource values and the application parameters. Applications should only be accepted from U.S. citizens not backed by foreign interests. Given public land is so precious every effort should be made to protect it.

EPA Brownfield (brown spaces) should be explored as an alternative to using up precious public lands. Nuclear energy is another energy source that can be explored.

BLM should involve local stakeholders extensively and allow longer time frames for collecting input. BLM should revise rules and regulations to reflect current research and impact to public lands and stakeholders. Stakeholders should participate in revising the rules and regulations. Stakeholders should have easy access (accommodating all special needs and language) and be given notice of all applications to use public land.

BLM should not have sole authority for decision making... there should be a council of stakeholders funded by state, federal and local government from each county involved for decision making. The council should be required to engage with all community members, disseminate information and collect input for decision making. The stakeholders should be in charge of decision making for all applications and land use.

Applicants for land use should be required to use stakeholder vetted experts for impact statement surveys. In particular, experts found to benefit from the applicants use of public land should be disqualified. Negative impacts to any resource values and stakeholders should automatically disqualify applicants from using the land. Thank you for your consideration.

Feedback From: Private Resident

Please accept my informal comments on BLM's long term planning process for wind and solar energy developments on public land in Idaho. Rather than submit multiple comments, I am submitting one comment containing six topics.

#1) Bonds: Wind energy presents many extreme risks to the environment, people, property and businesses. Many of these risks are dismissively hand waved away in Environmental Impact Statements (EIS) with the magic wand of "mitigation". This buzzword is used throughout the documents to give the reader the impression that all of these issues won't actually be issues, and can somehow be swept under the rug. Countless stories across the world from people who live and work near wind turbines contradict this and know that the concept of mitigation is mostly a fantasy.

One simple example is the view from the Minidoka Historic Site with regard to the Lava Ridge Wind Project Draft EIS. No matter which alternative is chosen, the turbines will still be visible by visitors to the site. The character and experience of visits to the site will be altered as long as the turbines are in operation. There is no mitigating this. So with that framing, BLM should not operate on the premise that these negative impacts *might* happen, or that they will be mitigated. Rather, BLM should assume these negative impacts *will* happen and the effects of mitigation will be negligible. With that in mind, a question that arises is: what is the process for people to report negative impacts, and how responsive should they expect BLM and the applicants to be? Will there be a 24-hour hotline they can call? Will it go to a live operator, or will they have to just leave a message and hope someone gets back to them in a timely manner? Is there a requirement that they be responded to within a certain amount of time? There needs to be some type of complaint hotline/process for rectification of these negative impacts.

For example: it's 10PM on a Sunday night during a freezing winter snow storm. An ice shard is launched off of a turbine blade, and levels someone's house. Several occupants are killed, but one survives. He is now outside in the cold, trying to report an ice throw so that other turbines can be shut down during the storm. Who should he call? Should he expect an immediate response? Or should he expect to wait 15 days to hear back? Another example: a hiker discovers hundreds of dead bats below a turbine, far more than was estimated in the EIS. Who should he call? Will the turbine be shut off immediately, or should he wait 15 days while a few hundred more bats get killed? The next question on this matter is: who pays?

BLM staff has graciously provided me with a link to the CFR which spells out liability for public lands permit grantees: https://www.ecfr.gov/current/title-43/subtitle-B/chapter-II/subchapter-B/part-2800/subpart-2807/section-2807.12

This says that grantees are liable for any damages caused to the United States or to third parties. This is a good start, but it should go farther. The applicant should be required to carry some type of bond or insurance, the funds of which are kept in an impound account for when the inevitable claims must be paid. This mechanism is already practiced, and is

mentioned in most EISs with regard to “Reclamation bonds”, which are money set aside for decommissioning. However, there are often no mentions of such bonds for the operations phase of the project. Making such a bond be standard practice for approving permits would go a long way toward alleviating peoples’ fears about future energy development projects. Last, BLM should devise some type of process that is more akin to arbitration, rather than a court proceeding. The reason is that when individuals are eventually and inevitably harmed by these projects, they shouldn’t have to spend a decade in court fighting a multi billion dollar global corporation just to be compensated for their loss. Rather, BLM should devise a simplified process which is focused on getting the payments out to injured parties as fast as possible. Should the payments rise faster than anticipated, or the damages continue to mount, BLM should reserve the right and the authority to shut down the project during the operations phase. Such a caveat could and should be included in the permit approval language.

#2) Shutdown authority: At the moment, and likely into the future, BLM is being asked to approve the usage of technology and associated machinery at a scale which has not been used before in previous BLM approvals in Idaho.

For example, the Lava Ridge Wind Project Draft EIS states on pp 2-4: “The generation capacity of Alternative B would be nearly 25% more than the largest existing wind facility in the United States” This means there is uncertainty on what the exact outcomes will be once the project enters the operations phase. BLM does its best to extrapolate from existing projects, but it can never be 100% certain.

For that reason, BLM should put a caveat in their approvals which states that if the impacts become unreasonably damaging to the environment, people, property and businesses, that they reserve the right to shut down the project completely at any point during the operations phase. This will help protect the public from negative impacts which were impossible to foresee during the EIS stage.

#3) Total emissions: Part of the justification for developing wind and solar energy projects is that doing so will “save” emissions that would otherwise be emitted from fossil fuel based power sources.

For example, this reasoning can be seen on pp 3-136 of the Lava Ridge Wind Project Draft EIS under the Avoided Emissions section. It states that it uses the EPA’s AVERT modeling tool to forecast the amount of avoided emissions. What is not clear is how many variables this tool takes into account. If BLM is to be honest about the avoided emissions, it needs to take *all* aspects of the project into account, and total how much they will all emit.

Some elements to consider:

-The production and installation of the wind turbines themselves. They involve the manufacture of many tons of concrete and steel, which are both very carbon intensive production processes. Steel accounts for between 7-11% of global C02 emissions: "<<link to non-federal website removed per DOI policy>>

-Wind and solar are generally installed far from the population centers which use the energy they generate. This requires the construction of long distance power transmission

lines. For example, the Lava Ridge Wind Project Draft EIS states in the Introduction on pp ES-i: “The project would consist of up to 400 wind turbines and associated infrastructure and a 500-kilovolt (kV) generation intertie transmission line” Constructing such a line would again require many tons of concrete and steel. It’s unclear whether the emissions from the manufacture and installation of the transmission line components were included in the AVERT model. Further, other forms of power such as natural gas fired power plants, are usually constructed closer to population centers, and thus need less transmission line construction. So for honest accounting, BLM should consider these differences in infrastructure emissions when comparing wind and solar to other forms of energy production.

-Wind and solar are intermittent, so it is expected that they will be coupled with some kind of energy storage system in order for the energy they produce to be more predictable and reliable.

For example, the Lava Ridge Wind Project Draft EIS states on pp 3: “and a battery storage facility” And also on pp ES-ix: “the capacity of the battery energy storage system would be determined in the final design phase” Not only is the size of the battery not known at this point, the type is also not stated in the EIS. With these unknowns, it’s unlikely that the AVERT model included the emissions from the battery production. Much like the comparison of transmission line distances above to other power sources, a comparison of battery production emissions to other power sources which do not need batteries should also be figured into the calculations. In addition to these, there are other construction elements listed on pp ES-ix of the EIS whose manufacture and installation will emit air pollutants. BLM should be both fully transparent and comprehensive in its analysis of avoided emissions. Should the avoided emissions drop below zero for a given project, that project should be denied.

#4) Cumulative effect: It’s clear that BLM’s long term planning vision involves multiple wind and solar projects blanketing southern Idaho. BLM needs to begin taking into account the concept of cumulative effect. Stated simply: while the impact in a particular area of one project may be minimal, the total impact across all projects in all areas could, and likely will be, devastating to the environment, people, property and businesses.

BLM should develop some type of impound account which all projects must contribute funds to such that when the negative impacts become so large, the funds can be used to mitigate damage or to pay out injured parties. Further, if BLM ascertains that the cumulative effect of the entirety of planned projects would lead to negative impacts so great that a project would be denied, it should begin the denials in the beginning with the first project, not at the end after the damage has been done. This would stop the damage from happening in the first place, rather than waiting until irreversible damage has been done to the region. For example: one project might not result in substantial declines in the Greater Sage Grouse population.

However, if all of the projects were to be approved, they could reasonably be assumed to have a devastating effect on the GRSG population. It would be irresponsible for BLM to approve the projects knowing full well what would happen. So rather than wait until the end, after the damage has been done, the projects should be denied from the beginning such that the cumulative effect never comes to be. This reasoning could be applied to human systems as

well, such as when ascertaining the cumulative negative impacts to airports and fire fighting ability.

#5) Economic impact: It is well known that the unreliable nature of wind and solar makes the electricity they produce very expensive, despite the claims of their proponents.

It is also known that BLM is required to include the socioeconomic impact of these projects on surrounding communities in their EISs.

What is unknown is a bit of a gray area: what is the economic impact on electricity ratepayers? Is BLM required to analyze this in their EISs? Jurisdictions which have heavy reliance on wind and solar also have very high energy prices. The state of California is one example (source citation links within):
"<<link to non-federal website removed per DOI policy>>"

The phenomenon of drastic rate increases seems to follow wind and solar wherever they are deployed (source citation links within):
"<<link to non-federal website removed per DOI policy>>"
"<<link to non-federal website removed per DOI policy>>"
Despite the claims that wind and solar can power a large and modern industrialized society, California's experience proves otherwise. After spending two decades investing heavily in wind and solar, the state still had to import a quarter of its energy in 2019:
https://www.eia.gov/todayinenergy/detail.php?id=46156

In 2021, California had to seek permission from the federal government to burn more fossil fuels, because their wind and solar dependent grid could not provide for the residents of the state: "<<link to non-federal website removed per DOI policy>>"

If wind and solar worked, then why did the above scenarios happen? The answer is simple: wind and solar don't, can't, and won't ever work for inherently physical reasons. They are intermittent, while the demands of the electricity users are constant. It's a fundamental design incompatibility. Which leads to the economic aspect: if we know that inundating the electrical grid with intermittent, highly volatile power sources leads to more expensive power, how can this be reconciled with the need to not negatively financially impact various neighborhoods and communities? How exactly does subjecting an entire state to electricity price spikes, brownouts and blackouts like California has experienced, benefit the state? How does causing manufacturers to flee the state due to unreliable power help us, particularly those of lower and middle incomes who work at such manufacturing facilities? BLM must address these concerns in their EIS documents, and if needed, use them as a justification to deny projects.

#6) Project lifespans: BLM needs to do much more due diligence when it comes to evaluating the claims of various project applicants regarding the lifespans of their proposed projects. For example, the Lava Ridge Wind Project Draft EIS states on pp ES-xix that the

operations phase will be 34 years. This is unrealistic because the machinery of the turbines degrades over time. This leads to a reduction in power output at a rate of about 1.6% per year, as can be seen in the discussion section of this paper which studied onshore turbines in the United Kingdom in 2013: "<<link to non-federal website removed per DOI policy>>"

As they degrade, they have to be stopped for maintenance more often, thus leading to a decline in power output. Eventually, the output becomes so small and intermittent, that the project is no longer profitable to run, thus risking premature shutdown. This premature shutdown means the original emissions reduction calculations mentioned above would have been too optimistic. In addition to the slow reduction in power output over time, they can experience abrupt stoppages in power output when they collapse in spectacular fashion, as seems to be happening more often as larger turbines get installed.
<<link to non-federal website removed per DOI policy>>

BLM should begin scrutinizing the warranty agreements that the project applicants have with the turbine manufacturers, as well as what insurance mechanisms are in place to replace the turbines when they collapse, which they inevitably will. As the articles noted above, insurers are raising their premiums. This will no doubt lead to the applicants balking at paying for insurance. BLM should remain firm on this and require them to have insurance for every single piece of property involved in the project.

Feedback From: Private Resident

BLM -- The area around Minidoka National Historic Site is sacred ground to the Japanese American community, including Japanese Alaskans (Alaska Natives), wrongfully incarcerated there during WW II. The area proposed for Lava Ridge is a high conflict area. Please advise renewable energy companies to avoid desecrating sacred ground and dishonoring Japanese American veterans.

Please consider the following in your report: Minidoka National Historic Site -- General Management Plan and Record of Decision (2006) and Fundamental Resources and Values as identified in the Park's Foundation Document; the Minidoka Relocation Center Boundary and requirement to preserve the MRC in the Minidoka legislation (2008) and 2006 Japanese American Confinement Sites Act as amended by the Norman Y. Mineta JACE Act of 2022; the Minidoka Traditional Cultural Property eligibility report and determination by the Idaho SHPO that the TCP is eligible for listing on the National Register of Historic Places; the nomination for the Minidoka ACEC (submitted to BLM in 2023); numerous Biden Administration authorities outlined in the Japanese American community scoping letter sent to BLM on March 1, 2023 as part of the Solar and Wind PEIS; the recommendations of the Lava Ridge Subcommittee (dated March 9, 2023), as submitted to the BLM Idaho RAC for its March 17 meeting.

Feedback From: Theodore Roosevelt Conservation Partnership

Karen Kelleher
Director, Idaho Bureau of Land Management
1387 So. Vinnell Way
Boise, Idaho 83709

Idaho Falls, ID 83401
March 10, 2023
RE: Idaho Renewable Energy Strategy

State Director Kelleher,

The Theodore Roosevelt Conservation Partnership (TRCP) thanks the Bureau of Land Management (BLM) for issuing IM-ID-2023-009 and opening its Idaho Renewable Energy Strategy for public comment. The TRCP is a national conservation organization working to guarantee all Americans quality places to hunt and fish. In addition to our 62 formal partner groups, the TRCP represents more than 116,000 individual members across the United States and 3,500 specifically in Idaho. In cooperation with other sporting and conservation organizations, we work with willing partners to ensure access to public lands while also working through federal land use planning to make sure big game animals – such as deer, elk, bighorn sheep, and pronghorn – have room to thrive.

The TRCP appreciates Idaho BLM's efforts to apply the IM 2023-15 variance process to both solar and wind renewable energy projects in Idaho via IM-ID-2023-009. This is a positive step because the variance process is rigorous, and it doesn't currently apply to Idaho, or to wind energy development, for that matter. Applying the variance process properly will help conserve big game migration routes and winter ranges in Idaho until BLM's Western Solar Plan is updated and future updates are made to the BLM Wind Energy Plan. The TRCP supports efforts by the BLM nationally to initiate a programmatic environmental impact statement given the recent rush of wind applications facing the state.

The TRCP also appreciates BLM expanding on the ROW leasing and grant screening process outlined in national IM 2022-27 by specifically identifying the 2015 Idaho and Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment requirements and Idaho Department of Fish and Game mapped big game migration/movement corridors into the Factors to be Considered for Renewable Energy Factors Analysis Report as outlined in IM-ID-2023-009, Attachment 3.

To that end, the TRCP believes that the presence of big game migration/movement routes as identified by the IDFG in a proposed project area associated with a renewable energy ROW application should automatically make that application fall into the "low priority" for processing category. The TRCP submitted comments on the IM 2023-15 variance

process and on areas that should be excluded from renewable energy development as part of our comments on BLM's 2023 Programmatic Solar PEIS revision scoping process to update the Western Solar Plan.

As we strive to move away from carbon-based energies to mitigate the worst effects of climate change, the benefits of renewable energy development must be weighed against the values of our public lands now, including their value to maintaining the long-term productivity of our fish and wildlife populations. Those fish and wildlife populations sustain publicly accessible hunting and fishing opportunities, which contribute to Idaho's $7.8 billion and America's $887 billion annual outdoor recreation- and conservation-based economies.

Maintaining intact habitats for a variety of species also provides them with more opportunities to adapt to a changing climate over time.

In conclusion, the TRCP thanks the BLM for the opportunity to comment on IM-ID-2023-009 and the Idaho Renewable Energy Strategy, and we appreciate the inclusion of sage grouse and big game movement/migration data into the pre-NEPA screening process. We think this is an important effort and would like to be involved and supportive as it is implemented. Once the preplanning process is completed, the TRCP again encourages the BLM to revise the national programmatic environmental impact statement for wind development, including Idaho.

Rob Thornberry
Idaho Field Representative
Theodore Roosevelt Conservation Partnership

Feedback From: Idaho Wildlife Federation

Thank you for the opportunity to comment on the BLM Idaho Renewable Energy Strategy. Idaho Wildlife Federation (IWF) is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations with 45,000 affiliate members and individual supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

Many resource management plans in Idaho are from the 1980s and in need of revision or significant amendments. Relying on these out of date or nonexistent plans to provide guidance to conserve values such as recreation or big game winter habitat and migration routes will not be effective in mapping out the future of renewable energy development on BLM lands in Idaho. RMP Amendments that do provide guidance on renewable energy development, such as those related to Sage-Grouse, are singularly focused on the needs for that one species. While good and necessary to keep in place, these amendments do not give assurances to other valued fish and wildlife species. For example, big game that occupy General Sage Grouse habitat are not provided any protections from renewable energy development in their migration corridors.

IWF appreciates the BLM's approach to apply the IM 2023-15 variance process to both solar and wind development in Idaho via IM-ID-2023-009. This is step in the right direction as the variance process is rigorous and it does not currently apply to Idaho, or to wind, for that matter. We also appreciate the BLM including the 2015 Idaho and Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment framework and big game movement and migration data into this pre-NEPA process. Any proposed project and renewable energy ROW application that occurs in big game migration/movement routes and critical winter range as identified by Idaho Department of Fish and Game should be considered "low priority" for processing category.

Processes are currently underway to effectively analyze impacts of utility scale renewable energy development, such as the Solar Programmatic Environmental Impact Statement, which would update the 2012 Western Solar Plan and add additional Western states in its analysis. With that, IWF believes a similar programmatic analysis should done to evaluate utility scale wind energy and associated transmission. This programmatic analysis is the most appropriate mechanism and venue to conserve values by establishing exclusion criteria and amending resource management plans to incorporate the latest and best available science on siting renewable energy projects on public land.

The questions prompted by the Idaho Renewable Energy Strategy cannot be answered with the brevity that the BLM asks of us during this process. These topics deserve a comprehensive analysis and public process with robust engagement. Once this pre-planning process is completed, we urge the BLM to initiate a Programmatic Environmental Impact Statement process for wind energy development that would cover Idaho BLM land and amend

each resource management plan. This, paired with the ongoing Solar Programmatic EIS process, are the most appropriate steps to ensure “Smart from-the-Start” renewable energy development on public lands in Idaho.

Thank you again for the opportunity to comment,

Garret Visser
Conservation Program Coordinator Idaho Wildlife Federation

Feedback From: Trout Unlimited

Thank you for the opportunity to comment on the BLM Idaho Renewable Energy Strategy.

Trout Unlimited (TU) is the nation's oldest and largest non-profit coldwater conservation organization with over 300,000 members and supporters dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU staff and volunteers have worked toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges. Additionally, TU recognizes the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes that the actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

TU appreciates the BLM's approach to apply the IM 2023-15 variance process to both solar and wind development in Idaho via IM-ID-2023-009. This is step in the right direction as the variance process is rigorous and it does not currently apply to Idaho, or to wind, for that matter.

Many aquatic species, including native salmonid and anadromous fish, are sensitive to disturbance and their habitats should be identified as exclusion areas for wind development and transmission.

We request that the BLM incorporate categorizing all native salmonid and anadromous fish habitats as exclusion areas, and that the spatial analysis of these areas be updated using the best available information.

Surface development within sensitive watersheds and close to or on top of riparian areas, wetlands, and streams compromises aquatic habitat and will make these aquatic systems less resilient, particularly as the climate changes and becomes more extreme. Public lands are vital to sustaining water resources, food security, energy security, and sensitive fish and wildlife populations. Renewable power production occupies large acreages in often remote areas that have not seen energy development. Utility-scale developments require networks of roads and utility corridors, transportation, and transmission capacity that does not exist today.

The following is a list of other issues we would highlight in the current process:

1. A lack of an organized public process and transparency
2. To reduce impacts of renewable energy development—not simply at the project site, but across Idaho—analyze the capacity and demands of existing transmission infrastructure and use this information to inform where BLM will incentivize developments.
3. Identify areas to prioritize development where the likelihood of resource impacts will be the lowest.
4. Use exclusion criteria to reflect the best available science and expand criteria to better meet new priorities.
5. Ensure that project impacts are avoided, minimized and offset where appropriate.

6. Consider the full social, environmental, and economic life cycle implications of renewable energy development. The current approach to the Idaho Renewable Energy Strategy seems extremely brief. The myriad issues associated with renewable energy development in Idaho deserve a comprehensive analysis and a public process with robust public engagement. As soon as practical, we urge the BLM to initiate a Programmatic Environmental Impact Statement process for wind energy development that would cover all Idaho BLM land, amend current Resource Management plans throughout the state, and inform future BLM planning documents. Along with the ongoing Solar Programmatic EIS process a comprehensive Wind PEIS will ensure public land values in Idaho are protected as we move toward a sustainable energy future.

Thank you for the opportunity to comment.

Trout Unlimited

Feedback From: Owyhee County Natural Resources Committee

Comment on BLM Renewable Energy Strategy in Southern Idaho

I provide the following comments as the Director of the Owyhee County Natural Resources Committee (NRC). The NRC is an advisory committee to the Owyhee County Board of County Commissioners. I also note that Owyhee County meets in monthly Coordination Meetings under the provisions of a Protocol for Coordination established in accordance with the FLPMP requirement for BLM to coordinate plans and actions with affected counties.

The Owyhee County Commissioners expect to continue to discuss this subject in Coordination Meetings with BLM Managers. Owyhee County's economy, custom and culture is tied to agriculture-farming on the private lands and grazing on a combination of the private, state and federal lands. Any impacts to land uses that displace livestock grazing or create problems for the farming activities on the private lands have a significant adverse impact on the county's economy and on the cohesiveness of our communities.

Owyhee County is also home to sage grouse and other species of interest and impacts to their habitats will have adverse impacts that go beyond the county. In many areas of the county where "mitigation" may be perceived to be a balance appropriate to authorize a renewable energy project, there will be significant impacts that may not be immediately apparent. The networks of roads needed to install projects and then maintain them, is an example of such impacts.

I participated in the Zoom meeting held on Monday, March 6, 2023. Many of the discussion points made by the presenters seem to address concerns/possible problem areas. It is my hope that in considering the various aspects of an application, the BLM managers and staff look closely at impacts to farming and grazing, to the negative impact of additional roads, to the disruption of wildlife and wild horse habitat and to the overall impact to quality of life in Owyhee County.

During the presentation, mention was made of the need to have transmission lines to which the proposed projects could connect to feed their generated power into the grid. One of the maps shown, which mentioned Gateway West Powerline, seems to show an incorrect location of the approved route. After significant efforts by the county and its citizens, the Gateway West project location was moved north of the original proposal and into land formerly part of the Birds of Prey NCA. This move was the result of Congressional action that was signed into law. Part of the basis for that move was in recognition of roads already in existence in the NCA area which were not present in parts of the county which were under consideration by BLM planners. A similar action occurred in response to West Wide Energy Corridor placement.

Pertinent to both actions was the issue of the permitting process by local government. Owyhee County Planning and Zoning ordinances require permitting by Conditional Use Permit for such structures as powerlines when they are proposed on private property. The code also requires that when such projects are proposed by an entity that is not the landowner,

the landowner must attest, with notary verified signature, that they support the application. During the period of opposition to the proposed route for Gateway West, more than 100 private landowners provided letters making clear that they would not support transmission line crossings of their private property. Those same letters were delivered to the agency during its reexamination of the West Wide Energy Corridors. The agency ultimately removed the proposed corridor through Owyhee County from consideration and cited the landowner opposition as a factor. I don't believe that opposition has changed.

During the development of the Gateway West and in the reconsideration of the WW Energy Corridors, the County raised the issue of Viewshed and impacts to such along the Owyhee Front. That remains a valid concern. Owyhee County has seen a local example of a "renewable energy" project that did not go as planned. Twenty or more years ago, in response to the effort to increase ethanol fuels, investors built an ethanol plant in the vicinity of the small community of Oreana in Owyhee County. The builder of the project capitalized on available funding (and probably grants and rebates), convinced local farmers to provide the crops and built a facility to convert the crop to ethanol. At the end of the first season, the developer cashed in on the sale of the ethanol, stiffed the farmers and disappeared. The abandoned facility sat unused for a number of years and was ultimately torn down. I expect there are some similar situations that could occur in the current surge to increase renewable energy facilities. Approving a renewable energy operation at the expense of a continuation of a grazing permit would be harmful to the county's economy and culture. Doing so for an operation that fails, or was intended to fail after tax rebates and other enticements are gone, would be much worse in that we would be left with the roads, land impacts and other elements of the failed operation.

As the plan for increasing renewable energy goes forward BLM needs to coordinate and consult with the County.

James B. Desmond

Feedback From: Private Resident

Thank you for the opportunity to go on the record because I have a list of questions that remain unanswered since literally day one of the Lava Ridge proposal process. But they are obviously signs of much bigger problems at BLM.

I'm sorry BLM staff don't like, or doesn't know how to respond to my questions – that doesn't make my questions any less valid or important for your Agency to address for this EIS process. And no acknowledgment is disheartening at best.

Some of the most important questions relate to the cultural competency of bureau of land management - staff, consultants and managers and their subsequent actions, decisions and priorities impacting the Minidoka National Historic site.

The BLM track record on this EIS is a clear disaster on engaging the vast Japanese American community with profound ties to Magic Valley. It really speaks volumes on the inability for BLM to successfully understand and engage historically marginalized community members who are nonwhite with any depth. You are convinced you understand - but your actions and words tell me otherwise.

By not ensuring BLM staff have the DE&I skills and the capacity to engage a diverse and nuanced way is flawed - especially in the 21st century. You are creating a hostile work environment for even the ones with good intentions.

I don't see how can you possibly think staff can understand and realistically assess the impacts on these communities you don't belong to? And yet some continue to drive a process when you clearly do not understand the communities you are impacting at all, nor the harm you are visiting on them.

I shudder to think how the tribes are being managed in your processes. They too deserve much better. My apologies to them.

As you check your boxes, What y'all are missing is What about the harm that cannot be mitigated? What about the things that compensatory mitigation can't address for the harm that is being inflicted or the thing being taken? You expect people to comment on mitigation when no amount of money can replace what is being proposed here… We know you don't want us to sell your grandma. But if we did, how much would you want?

Your process is flawed. <<link to non-federal website removed per DOI policy>>. Hear. Consider. I also have lots of comments on areas for vast improvement on your public engagement and outreach efforts having years of experience. I would like to formally request a meeting with BLM management overseeing the management of the Lava Ridge process, especially involving the communications decision makers.

Having y'all deciding what is and isn't Environmental justice is a total disappointment. Y'all need to do better. Much better. It isn't that difficult.

Feedback From: Private Resident

To whom it may concern:

Please consider my comments regarding the BLM Idaho Renewable Energy Strategy. Wind and solar energy should NOT be sited anywhere on public land. These sources of energy are unreliable, intermittent and expensive. Consumer Energy costs increase because wind and solar need a backup source of energy to keep the power grid operating reliably. Examples of the impacts to energy rates are found in California and Europe. Higher energy rates negatively affect lower income people the most.

Wind and solar are very land-use intensive compared to other sources of energy production like nuclear, hydropower or natural gas. For example, a wind project requires 700 times the amount of land to produce the equivalent amount of energy of a natural gas plant. Wind and solar energy are not "green". More fossil fuels are used in the manufacture, transportation and maintenance of wind turbines and solar panels, than are saved by relying on these sources of energy. Wind and solar energy companies are complicit in human rights abuses. The minerals used (cobalt, lithium, nickel, etc.) for battery storage of wind and solar energy are mined in impoverished countries using child and slave labor. These minerals are very toxic – they pollute and contaminate the communities and people where the mines are located.

By siting a solar project on public land, acreage meant for multiple users becomes single-user land due to the fencing required around the solar project. Wind turbines placed on public land infringe upon the enjoyment of other users because the visual quality of the landscape is destroyed.

These types of projects fragment vital wildlife habitat and are responsible for significant animal casualties. Cumulative impacts must be considered as well since multiple wind and solar projects sited within the same region will displace wildlife from its environment .

As communities learn more about the downsides to the wind and solar industries, the public will be more opposed to these sources of energy being placed upon both public and private land.

History will not judge these industries favorably.

For your review, listed below are sources to consider which expose the detrimental impacts the wind and solar industries have on wildlife, the environment, and human health. Thank you

Wind and Solar Energy Reference Material

If you want to learn about all of the detrimental impacts Wind and Solar projects have on the environment, wildlife, cultural resources, humans, property values, health, etc., here are several sources for you to learn more:

1. Join the Stop Lava Ridge Facebook group -over 4250 members and growing
2. <<link to non-federal website removed per DOI policy>>
3. <<link to non-federal website removed per DOI policy>>
4. Documentary: Planet of the Humans, a Michael Moore production, YouTube
5. Documentary: Blown Away, a Tucker Carlson production, Fox Nation Please note that Moore and Carlson are polar opposites politically, but they reach the same conclusions.
6. Book: "Apocalypse Never", Michael Schellenberger
7. Book: "Climate Chronicles", Joe Bastardi
8. Book: "Fossil Future", Alex Epstein
9. Documentary: Headwind 21, YouTube
10. Interview: What Impacts Do Wind Turbines Have on the Environment and Our Health? YouTube
11. Book: “Climate Change Reconsidered II: Fossil Fuels, Nongovernmental International Panel on Climate Change

If you care about the human rights abuses meted out on indigenous communities and African and Asian countries in the name of "green" energy check out these sources:
1. Book: "Cobalt Red", Siddharth Kara
2. Article: "Workers are Dying in the EV Industry's 'Tainted' City, Wired Magazine
3. Video: "How Wind Farms are Making Reindeers Fade in Norway", YouTube

Feedback From: Private Resident

Thank you for this opportunity to present some of my concerns about renewable energy development in Idaho. I am a 4th generation Idaho native and greatly value the natural and cultural resources of my home. I appreciate your efforts to understand how these resources can be affected by proposed development.

I am concerned about the unprecedented increase in renewable energy developments proposed on federal lands in Idaho and already built, approved and/or and operating on private and state lands here. As you move forward with planning for projects on federal lands, to the best of your ability, I ask that you please ensure that non-federal projects (built, approved, and proposed) are included in cumulative impact assessments. The large 620MW wind development recently approved in Bingham and Bonneville Counties west of Idaho Falls is an example of a project that will have significant impacts. It is also important to note in cumulative impact assessments that these private ventures are generally not subject to federal permitting and law and as a result, impacts associated with them will go largely unassessed and unmitigated. Please consider adding a layer in your mapping tool that shows renewable energy development on non-federal lands.

I am concerned about impacts to cultural resources that are listed on the National Register of Historic Places, National Landmarks, National Monuments, National Historic Parks and Sites, National Historic Trails, National Natural Monuments, and highways, roads and trails that have been designated as scenic or historic nationally, by the State, and/or by BLM or other groups. Please consider adding a layer in your mapping tool that shows the publicly available information for these resources, including any visual resource management restrictions currently in place.

I am concerned about impacts to iconic landscape features that are important locally, but may not be recognized nationally. In Southeastern Idaho, this includes but certainly isn't limited to Borah Peak; the Twin Buttes (Middle and East), Big Southern Butte, and the Menan Buttes; recent lava flows like Hells Half Acre, Cerro Grande, and the various Craters of the Moon flows; the canyons of the South Fork and Henrys Fork of the Snake River; and the Saint Anthony sand dunes. These features define home for me and are emblematic of the wide-open spaces and natural resources that are valued by so many Idahoans. The physical integrity of these places is important and the viewsheds are too. The views from places like this are important, but I would stress that views OF them are equally important. Lastly, I also understand that the Shoshone-Bannock Tribes strongly value the views of features like this, particularly the Buttes.

I am concerned about impacts to resident and migratory bats and their habitats. Background information on local bat research through federal and state agencies, universities, and volunteer organizations is essential to design survey strategies and fully characterize risks from proposed projects. The lava tube caves, rifts, crevices, cliffs and canyons of the volcanic landscape of the Snake River Plain provide critical roosting habitat for resident bats as they raise their young, forage, and hibernate. Migratory bats also find critical stopover habitat in

these volcanic features as they make their way across the southern Idaho deserts to warmer destinations down south in the winter and back again to feast on insects in the forests of the mountainous heart of central Idaho during the summer. Both resident and migratory species also find roosting habitat among juniper trees on the desert. Long term BLM goals for removal of juniper trees could combine with removals associated with renewable energy development to eliminate a very large portion of this woody desert habitat to the detriment of the bats and birds that use it for roosting and nesting. It is imperative that project proponents develop a detailed understanding of local conditions within their proposed project areas. Please consider adding map layers to your planning tool that show karst and pseudo karst landscapes throughout Idaho as well as a detailed vegetation coverage that includes juniper.

I am concerned about impacts to resident and migratory birds and their habitats. As with bats, local information is also essential to design surveys strategies, fully characterize risk, and develop meaningful mitigations. Please consider adding "Important Bird Areas" and other long term regional survey efforts such as the Winter Raptor Survey project <<link to non-federal website removed per DOI policy>> to the mapping tool.

I am concerned that project proponents will fail to identify relevant local data on bats and birds, relying exclusively on national databases such as NaturServ <<link to non-federal website removed per DOI policy>> and US Geological Survey's Gap Analysis (https://www.usgs.gov/programs/gap-analysis-project) for the background information that will form the foundation for environmental assessments for proposed projects. Local agencies and experts can provide critical feedback on current research efforts, while the national databases often lag. It is essential to involve these local experts and their up-to-date perspectives in discussions of resource distribution, survey design, impact assessment, and mitigation to prevent population-level impacts to numerous species.

For the benefit of all, I also believe it is imperative that survey reports, bird and bat conservation strategies, post construction fatality reports, and mitigation strategies and thresholds be shared with local experts and shared to the public domain with necessary redactions to protect sensitive locations.

Thank you again for considering this feedback.

Feedback From: Private Resident

My concerns are cultural resources, known and unknown. Natural resources, wildlife, views and vistas, recreation, hunting, fish, gathering. Water is always a huge concern in high desert regions. Economic concerns regarding adverse affects on tourism, recreation, grazing. Improper use of water and or development that damages current sources of water will be excessively detrimental to agriculture, municipal water sources, commercial operations and all aspects of life in Idaho.

Locations and areas that are protected by TCPs, ACECs, national historic sites, sites listed on the National Register of Historic Places, designated wilderness areas, areas that protect certain wildlife should not encumbered by nearby renewable energy sources. Exclusion areas should be established around these sites for solar and wind projects specifically. Private equity firms should be disallowed from development unless they are willing to be transparent and list their investors.

More transparency between the applicant and the public should be available including financial status, social justice policies and environmental policies of the firms. Experience of the developer in the given field should be available and future intent of the developer for the project should be revealed.

Feedback From: Idaho Conservation League

March 10, 2023
Karen Kelleher
Idaho BLM State Director BLM
Idaho State Office
1387 South Vinnell Way Boise, Idaho 83709
Submitted via online form to bit.ly/blm_idaho

RE: Idaho Renewable Energy Strategy To the Bureau of Land Management,

On behalf of the Idaho Conservation League, we are writing to fully support the Bureau of Land Management's (BLM) effort to develop a Renewable Energy Strategy for Idaho. We offer the following comments.

Founded in 1973, the Idaho Conservation League (ICL) strives to be Idaho's voice for clean water, clean air, healthy fish and wildlife populations, and responsible use of public lands– foundational ingredients for Idaho's extraordinary quality of life. ICL does this through citizen action, public education, and professional advocacy. As Idaho's largest and oldest state-based, non-profit conservation organization, we represent approximately 25,000 supporters across the state, many of whom have a personal interest in protecting Idaho's public lands and in responsible energy development.

ICL has long advocated for protection of public lands in Idaho, often in close cooperation with the BLM. Climate change adds new dimensions of complexity and urgency to this long standing mission. A rapid shift to low carbon and renewable energy is necessary to maintain productive and ecologically functioning landscapes. We support renewable siting on BLM lands where it offers an optimal location. ICL believes this advance planning can successfully balance the urgent need for low-carbon energy with deeply held local values in public lands.

Recent energy and transmission projects on public land in Idaho encountered considerable local opposition, partially rooted in a perception that decisions impacting local landscapes are made out of state only for the benefit of those out of state. Compounding this is the fact that many of the BLM's Resource Management Plans and Management Framework Plans have not been amended recently to reflect a number of issues that may complicate or preclude energy development.

Both climate change and renewable development will place new strains on public lands in Idaho. ICL hopes to support BLM in energy siting that is respectful of local values, landscape conservation, and cultural resources. BLM's outreach efforts for the Renewable Energy Strategy are welcome and appreciated but the timeline for meaningful public involvement is far too short. While we appreciate that a summary document will be released on May 1, we believe the BLM needs to follow up with a Programmatic Amendment process to update the various Resource Management Plans accordingly to provide more certainty for public lands stakeholders and project proponents.

Without a consistent approach to this issue, we are concerned that public lands are going to be developed in an uncoordinated and patchwork manner with projects receiving different levels of scrutiny, varying levels of protections, inconsistent design features, insufficient mitigation measures and suboptimal coordination for efficient energy development.

We recommend the agency use these data sets to identify points of intersection, with the greatest number of overlapping layers representing regions that are least appropriate for project development. In areas that have extremely high numbers of conflicts, we recommend that the BLM clarify the values at risk and consider designating these areas as Areas of Critical Environmental Concern and/or No Surface Occupancy Areas for projects that would substantially impair these values.

At the same time, areas with fewer intersection points may identify regions where renewable energy projects might be the least disruptive. The BLM should seek to promote projects with economical wind and solar resources that are closest to transmission line infrastructure in areas that do contain relatively fewer conflicts. We recognize that no areas of public lands will be entirely conflict free but note that some conflicts may in fact be compatible with certain types of development in certain scenarios. In either case, this method provides a non-biased, science-based method of determining siting appropriateness and may help the BLM avoid contentious project proposals in the future. These data could also help future project proponents and the BLM identify topics of concern and address those issues prior to undertaking the NEPA process. In the interim, the BLM should use the prioritization criteria to advance projects with the fewest complexities.

The BLM should utilize the mitigation hierarchy and first seek to avoid conflicts before minimizing impacts and finally mitigating residual effects. The ultimate goal should be finding win-win scenarios wherever possible. The BLM should also provide additional information about the factor summary analysis report that project proponents will be required to complete.

Below are our responses to the prompts for the Renewable Energy Strategy.

What resource values are you concerned about?

Applicants factor analysis list is available at https://www.blm.gov/idaho-renewable-energy-strategy

Are there locations/regions that may be desirable for alternative energy siting? Where? Why?

We appreciate the BLM listing resources on the Renewable Energy webpage that should be used to optimize the siting of renewable energy projects. We also recommend that the BLM point out the value of siting projects within close proximity to existing transmission lines and substations to avoid constructing miles of collector lines and transmission lines through public and private properties which could further fragment the landscape. We advise BLM to consider both existing and planned transmission infrastructure in scoping consistent renewable strategy. The planned Boardman to Hemingway transmission line to be built by

Idaho Power and PacifiCorp will transform the energy landscape and markets in Idaho. Though at the time of this letter the project still requires final certification by the Idaho Public Utilities Commission, approval and eventual construction of the project has been a reasonable certainty for much of its decade-long development. Though they exist in various stages of planning and construction, the proposed Gateway South transmission line and Gateway West expansion stand to similarly expand the energy landscape of Idaho and the Intermountain West. Where possible, an informative plan should consider both existing infrastructure and lines likely to be built during useful planning timeframes.

Are there locations/regions that are of concern? Where? Why?

We support the continued use of the current BLM exclusion map to identify areas unsuited for utility scale renewable energy projects. As the BLM moves forward with this analysis, we recommend the agency develop a GIS-based protocol that incorporates multiple levels of data, including, but not limited to Endangered Species Act (ESA) listed species and their habitats, wildlife species listed on State or Federal sensitive or indicator species lists, cultural resources and the site density of these historic properties, the needs and concerns of underrepresented communities, solar project development potential, sensitive and/or threatened ecosystems, and Tribal concerns, to name a few. The agency should also consider the cumulative impacts of previous development and anthropogenic disturbances throughout the West, particularly within the Great Basin and the Sagebrush Steppe ecosystem.

There are several additional layers that the BLM should consider as avoidance areas (listed as a potential conflict but not necessarily precluded) or exclusion areas (listed as precluded). These include the following:

Lands with Wilderness Characteristics

The BLM should include a layer of Lands with Wilderness Characteristics as avoidance areas. ICL previously submitted GIS layers for areas in the Shoshone Field Office that meet LWC characteristics. Our office can resubmit these as needed.

Important big game habitats, movement routes, and migration corridors Per Instruction Memorandum 2023-005 Change 1, the BLM should place a stronger emphasis on consideration on ensuring that habitat connectivity, permeability and resilience are restored, maintained, improved and/or conserved on public lands for native fish, wildlife and plants. Important areas of habitat as identified by state or federal agencies, Tribes, Universities, non-profit organizations and others should be reviewed as avoidance areas. If these areas are lacking in habitat quality, such as sufficient vegetation for forage or cover, the BLM should also prioritize these areas for restoration.

Migratory pathways for birds and bats There are a number of seasonal migratory flyways utilized by both birds and bats that are well-known such as Lucky Peak. In addition, there are daily movement patterns from feeding to roosting areas. We highly recommend that the BLM collaborate with other stakeholders to determine the locations and seasonalities of various flyways. Such flyways should be considered exclusion areas or have seasonal or daily restrictions to reduce impacts.

Culturally significant sites where development would be inconsistent with site integrity and experiences Native American cultural sites and National Historic Sites such as the Minidoka National Historic Site should have a sufficient buffer around them to protect the experience of people who value these special places.

In developing a renewable energy strategy the BLM should carefully consider the locations of any Traditional Cultural Properties, sensitive natural resources integral to cultural identity, or sites that fall under the purview of the Native American Graves Protection and Repatriation Act. Potential tribes to include in this consultation include, but are not limited to: The Shoshone-Bannock Tribes of the Fort Hall Indian Reservation, the Shoshone-Paiute Tribe of the Duck Valley Reservation, the Confederated Tribes of the Umatilla Indian Reservation, and other Shoshone-Paiute peoples. These efforts must extend beyond a single letter asking if the Tribal governments are interested in participating in a cultural consultation, as has been the case for previous large projects throughout the West.

We encourage the BLM and developers to work to better understand tribal concerns and identify issues or locations of concern, sometimes without learning the exact location of identified resources or TCPs as these locales may fall under cultural identity protective status. While this may make consultation and protective efforts more difficult, it is important to recognize and acknowledge past wrongs and a certain degree of mistrust that First Nation peoples may feel regarding the release of protected information, tribal history, and cultural identification.

We also recommend that the BLM examine how not just climate change but societal adaptations to climate change - such as this project - are affecting Native American communities:

Increasing indigenous participation in climate-change initiatives is one potential solution for increasing the resilience of indigenous communities. Indigenous perspectives and traditional knowledge must guide climate-change assessment and adaptation to develop culturally appropriate strategies. It is our hope that renewable projects can be designed in such a way that adequately responds to tribal concerns.

Is there anything else BLM should be considering in this process? Please explain.

Public involvement Public support for renewable energy projects is necessary to achieve a clean energy future. We believe that public lands work best when the public is meaningfully involved, has all the factual information needed to critically evaluate a project, and has a say in the siting and design of these projects. Failure to address these issues threatens the development of currently proposed and future renewable energy projects in Idaho.

A transparent, public process is the best way to build confidence in renewable energy projects and to prevent renewable energy projects from being proposed in unsuitable areas. Once the BLM has gone through this process and identified a discrete number of sites and acreages suitable for energy development, the BLM should apply its Prioritization Criteria for these sites and facilitate the permitting of projects that are “smart from the start.”

Programmatic approach As mentioned earlier, a programmatic approach needed to select appropriate areas for renewable energy development. State and federal agencies need to

be clear that to meet Idaho's clean energy goals and the nation's renewable energy goals, it will not be necessary to develop all potential lands in southern Idaho with solar, wind or geothermal energy projects. However, we are concerned that less suitable sites with conflicting public values may be developed. At this point, there is nothing in the BLM or State direction that would specifically preclude overdevelopment in problematic areas or help direct development in more suitable areas.

Just as the Greater sage-grouse RMPA focused on management issues that may affect Greater sage-grouse, this Renewable Energy RMPA would update RMPs to examine resource energy potential and energy transmission and the effects that these projects might have on cultural resources, wildlife habitat, recreation and other community values. For areas that are identified through this RMPA process as being incompatible with renewable energy development, the RMPs should be amended to preclude such development and safeguard these resources. For areas that are deemed not suitable for renewable energy development, this determination should be codified in the RMP amendments. Temporary segregation or withdrawal for renewable energy projects, similar to an administrative mineral withdrawal, could be another option.

Visual Resource and Dark Sky Impact Modeling and Management The BLM should consider how scenic viewsheds could be affected by renewable energy projects and associated above-ground electrical lines. These viewsheds could even inform models of scenic quality, such as Natural Capital Project's Integrated Valuation of Ecosystem Services and Tradeoffs (InVEST) scenic quality model. These landscape-level GIS analyses are an important first step in the visual resource impact modeling and management process.

Not only can the view of renewable development and electrical infrastructure during the day impact the visual and scenic quality of an area, but the flashing red lights for aviation can impact night skies as well. ICL supports the use of radar detection systems such as aircraft detection lighting systems to mitigate any need for continuous operation of night time red lights. If light pollution is an issue, there are a number of Dark Sky related measures that could be adopted in the larger area to serve as an offset and potentially result in a net decrease in light pollution. Craters of the Moon is already a designated Dark Sky Park, but light pollution from other areas is marring night sky observations. Light pollution prevention measures could be considered by surrounding communities. A Dark Sky designation may even be tailored to fit the community's circumstances and wishes.

Renewable Energy Conservation Plans The California Desert Renewable Energy Conservation Plan was a public process involving the BLM, the state of California and counties. The plan started out with approximately 20 million acres under review for potential projects and was then narrowed down to some 11 million acres of public lands. Lands not deemed appropriate for energy development were safeguarded with conservation measures to protect local values, while lands that were deemed appropriate for development included mitigation measures and setbacks for wildlife and cultural resource issues. Counties received support to engage in this process. Although this particular process took 8 years, the lessons learned from this process could be applied more strategically and help federal, state and local governments in Idaho address this issue.

Update and tier to the BLM's Wind and Solar Programmatic EIS The BLM could work with the state, county, Tribal governments, and members of the public to update the BLM's Wind and Solar Programmatic Environmental Impacts Statements for southern Idaho to provide more specific direction similar to the BLM's Solar Energy Development programmatic EIS for western states including CA, NV, NM, AZ, UT, and CO. We are encouraged by the BLMs efforts to develop an updated PEIS covering eleven Western states including Idaho. The BLM could tier to the PEISs and provide a more specific analysis to all RMPs in southern Idaho with an updated review process. Protecting cultural values for Shoshone-Bannock and Shoshone-Paiute Tribal members, as well as for members of the Japanese-American community associated with Minidoka National Historic Site, will be a critical component to this process. Competitive application process The Nevada BLM is successfully using the Southern Nevada District Office Competitive application process to prioritize the permitting of projects with the fewest resource issues over projects with more significant resource issues. As part of this process, the BLM proactively identified polygons of suitable areas for potential renewable development instead of simply responding to a project proponent's application. Project proponents who wish to have a priority application can submit a bid to be the primary applicant. While at this point only the Lava Ridge project is under review, other projects in Idaho are on the calendar for consideration and should be assessed through a similar process.

Thank you for the opportunity to comment and all outreach efforts during this effort. We strongly encourage the BLM to use a programmatic approach to siting renewable projects and look forward to participating in all phases of this process.

Respectfully submitted,

John Robison

Public Lands Director Idaho Conservation League Brad Heusinkveld Energy Associate Idaho Conservation League

Feedback From: Private Resident

I am concerned about the loss of sagebrush steppe ecosystem and the loss of habitat for Sage grouse, sagebrush sparrows, brewers sparrows, vesper sparrows, both types of shrikes & more. I am concerned about the loss of habitat for deer and rabbits and more. I am very concerned about the loss of bats and birds (including eagles and hawks) to windmills. I do not think there should be windfarms or solar farms where there is sagebrush - put them on cheat grass monocultures instead.

I would like to make sure that the miles of area west of hwy 93 are not impacted because the habitat seems somewhat intact. I use this as an example but it is certainly not the only place that I feel should be protected from this type of development. Cheatgrass monocultures are probably as good spot for renewable energy development as there is depending on whether they are migration routes for birds, bats, deer and antelope.

BLM should look at size (both of the area that the project would cover and where it would be visible from). BLM (as you appear to be trying to do) needs to get out front & identify places where windfarms/solar farms may be more acceptable in their impacts rather than letting the industry pick the places that will allow them to make the most money. You need to protect the little bit of sagebrush steppe that is left in southern Idaho. A couple things that we are hoping that you are considering: 1st on a cold winters day when it takes more electricity to keep the turbine/windmill blades free of ice will this technology look promising??? or will the companies just be making their money on federal subsidies??? will the damage to the ecosystem be worth the net electricity??? will electricity just get more expensive because they need the electricity to heat the blades with (it is the electricity that we now use our houses)??? where will they get this electricity????. In the long run will the government have the foresight to require enough bonding for clean up of the wind turbine sites when the windfarms reach the end of their useful life cycle??? (much like the federal government does with mining operations) or will taxpayers be stuck with clean up in the future years to clean these giant wind turbine sites up??? are these wind turbines recylable??

Feedback From: Private Resident

I wanted to voice my concern over the wind turbines as an alternate source of energy. Economically, I am concerned it will only raise our taxes. They do not seem to generate much power without using up many, many acres of land. The explosives needed to install the windmills can damage our aquifers. Furthermore, it is unclear what damage these may do to cattle as an effect of the spinning turbines. The damage they can cause to our ecosystem from the destruction of monarch butterflies, bats, birds, and other animals is also something that could have an adverse affect on the human population. For example, turkey vultures are known to breed in southern Idaho. Turkey vultures feed on dead animals. This is helps prevent the spread of disease to humans. It is my suggestion that we do not go forward with using BLM land for wind turbines or other alternative sources of energy that are not cost effective and use up lots of land. Thanks for considering my feedback.

Feedback From: Private Resident

I'm involved with the Twin Falls Highway dist. We have delt with other windmill projects. Bell Rapids, the builders and developers use and tear up our roads wider radius when they do this, they don't do it to our standards. When they are done, we had to fix and repair all this. It is very expensive and time consuming and they don't contribute anything to this cost.

Our range, land, and grazing is very important to us they don't care about what it does to us, the hardships they impose on our way of life that we have had for generations.

The amount of water and gravel they want is not a good thing for our community.

Feedback From: Private Resident

1. Preserve and protect our high desert habitats.
2. Private ground (poor farm ground for instance. Bell Rapids is a good place.)
3. Lava Ridge is one of the worst places same with Salmon Falls.
4. Nuclear is coming relatively soon. Base load must back up any intermittent
5. Swip line is okay, but it has a capacity of 2000 MWLS power alone is planning 3000 MW just in magic valley.

Feedback From: Private Resident

Energy we need as a state. I also think that nuclear energy is an option for our state. The advances in this type of energy are worth exploring as a viable option for these other states. It seems like creating alternative can be done in a way that is not so intrusive to the landscape

Feedback From: Private Resident

The main desirable location I would consider fit for the installment if wind turbines is the unused open landscape plotted for lava ridge. From the information displayed about grazing impacts, water usage, land impacts, and visual/ auditory issues, there is little to no disturbances that would affect anyone in the area of effect.

Feedback From: Private Resident

I can’t see how the mission of BLM-Idaho is served by this project which is sending energy to Californians so they can feel good about their electric cars. The desert is fragile. This project does not sustain “the health, diversity and productivity of public lands for the use and enjoyment of present and future generations” of Idahoans!!! I am particularly concerned about bat populations. Bats are culturally maligned any way and they are so important to an ecosystem. Because they are nocturnal, they are easily forgotten. This project makes me weep!

Feedback From: Private Resident

What is being done to protect trees and what steps are being taken to preserve trees in construction zones?
During construction are steps take to prevent noxious weeds from germinations when soil is disturbed?
Who holds the applicants accountable?
There should be a community board formed to represent Idaho.

Feedback From: Private Resident

I think they are awesome bring the on. Thank you for the work and jobs this will provide. What a better way, than the wind.

Feedback From: Private Resident

Water: Who is going to pay the landowners for their losses if there's damage to the aquafer?
Why is the BLM so willing to let the public get shut out of land that has been at our accessibility any time we want, just for what appears to be a monetary fain for BLM?
Do you really feel the animals won't be pushed out of their habitat?
It would cost a lot less to build these close the user destination (Southern Nevada + California)

Feedback From: Private Resident

I'm very concerned about the impact the wind project would have on our aqueduct and contamination from the wind project. The aqueduct is our water resource for the magic valley so it is very concerning to me that our drinking water would be contaminated by pollution from the windmills. It is also very concerning to me that it would drastically affect the migration routes our birds of prey, I.e.. Eagles, falcons, bats, and monarch butterflies. Not to mention our already protected sage grouse habitat.

Our T.F county landfill has (is working on) a project which will provide both natural gas and power resources for us here in the magic valley and can be up and running in about a year and is completely renewable energy for now and long term. It would be a much better resource for us and fully funded.

Feedback From: Sakura Conservation Strategies, LLC

Thank you for setting up the call this week re the renewable energy strategy for Southern Idaho.

I reviewed some of the information and wanted to share language from Section 5 of Secretarial Order 3399 which requires coordination with environmental justice communities early in the planning process.

c. Tribal Consultation and Environmental Justice Engagement in NEPA. In conducting NEPA analyses, Bureaus/Offices must consider impacts on both the natural or physical environment as well as social, cultural, and economic impacts. Historically, many Federal agencies have not consistently obtained Tribal input or coordinated with Tribes to integrate Tribal concerns into the decision-making process. Tribal consultation is a means to rectify this by recognizing the government-to-government relationship and considering Tribal interests in decision making. Minority and low-income communities across the country are disproportionately exposed to industrial, waste-disposal, or other facilities that emit harmful air pollution. Environmental justice seeks to address the disproportionately high health and environmental risks found among low-income and minority communities by seeking their fair treatment and involvement in decision making. Bureaus/Offices will proactively begin consultation with potentially impacted Tribes, both those currently in the proposed area and those with a historic presence, as well as engage potentially impacted environmental justice communities early in the project planning process. “Early in the project planning process” includes when a Bureau/Office has enough information on a proposed action to determine that an environmental assessment or an environmental impact statement will be prepared.

Also, please find attached comments submitted by the Japanese American community to BLM as part of the Solar and Wind PEIS scoping period.

Also attached in the NPS letter to the Japanese American community regarding the Lava Ridge wind project’s impacts on Minidoka NHS.

Hope this is helpful to you and the Bureau.

Dan Sakura

Sakura Conservation Strategies, LLC

202-309-1497

First Attachment to Feedback from Sakura Conservation Strategies, LLC

Solar Energy PEIS Scoping
Bureau of Land Management
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20006

March 1, 2023

Dear BLM:

Thank you for the opportunity to submit scoping comments relating to the solar and wind energy programmatic environmental impact statement (PEIS). We support administrative decisions to protect the Minidoka National Historic Site and other Japanese American historic sites from solar and wind renewable energy siting. Our organizations work to tell the stories of the wrongful incarceration of Japanese Americans during World War II. These incarceration sites are sacred to Japanese Americans and critically important to tell America's whole story.

The Japanese American community is a dispersed environmental justice community and underserved community. Our community also includes Japanese Alaskans, who have both Japanese and Alaska Native heritage (Tlinkit, Haida, Tsimshian, Aleut and Inupiat), who were incarcerated at Minidoka.

Our community is fighting to protect Minidoka National Historic Site from LS Power's proposed Lava Ridge wind project on BLM public land and to preserve other incarceration sites as places for healing and learning.

We respectfully request your consideration of our comments:

SOLAR AND WIND EXCLUSION CATEGORIES

Our organizations support retaining existing exclusion categories (#23 and 25), amending #24, and adding two new exclusion categories for solar. We encourage that BLM to consider adopting the amended list of solar exclusion categories to wind energy projects.

- National Historic Landmarks and Traditional Cultural Property. Our organizations support retaining existing exclusion categories (#23 and 25) for solar and adding exclusion categories for wind. As noted below, we encourage BLM field offices to inventory BLM lands and amend their land use plans to preserve Japanese American incarceration sites designated as National Historic Landmarks (NHL) and identified as Traditional Cultural Property (TCP) by the Japanese American community. The National Park Service has summarized its NHL findings in the National Historic Landmark (NHL) Theme Study entitled "Japanese Americans in World War II." See also: Western Archeological and Conservation Center, National Park Service, U.S. Department of the Interior, "Confinement and Ethnicity: An Overview of Japanese American Relocation Sites," Publications in Archeology 74.

- National Register Listed Sites. For exclusion category #24, National Register property, we recommend adding property deemed "national register eligible" by the SHPO.

- National Parks. Designate exclusion categories around units of the National Park System.

- Japanese American Confinement Sites (JACS). Please add a new exclusion category entitled Japanese American Incarceration Sites, for sites listed by Congress in the Japanese American Confinement Sites Act of 2006 (P.L. 109-441) and as amended by the Japanese American Confinement Education Act of 2022. (P.L. 117-328, Division DD—Public Land Management, Section 644). The legislation references sites described in Confinement and Ethnicity.

- Japanese American World War II History Network. Please add a new exclusion category for sites designated as part of the Japanese American World War II History Network (P.L. 117-328, Division DD—Public Land Management, Section 645).

MINIDOKA TRADITIONAL CULTURAL PROPERTY-LANDSCAPE OF INCARCERATION

In 2022, the Friends of Minidoka commissioned a Traditional Cultural Property (TCP) report entitled "A Landscape of Isolation: A Traditional Cultural Property Study of the Minidoka Concentration Camp and its Viewsheds in Jerome, Lincoln, Blaine, and Minidoka Counties, Idaho, with Recommendations as to their Eligibility for Listing in the National Register of Historic Places."[1] The TCP report concluded that BLM lands in the viewshed of the Minidoka National Historic Site and Minidoka Relocation Center constitute TCP for the Japanese American Community:

> "… the Minidoka property qualifies as a TCP and is a historic property eligible for listing in the NRHP. The Minidoka TCP can best be described as a historic traditional cultural *district* that both retains integrity and is eligible for inclusion on the NRHP under criteria (a), (b), (c), and (d) … [and] that the Japanese American descendant community's history, heritage, and identity are all intimately tied to the Minidoka TCP."[2]

In 2023, the Idaho State Historic Preservation Office has determined that the TCP is National Register eligible.[3]

PETITION FOR GREATER MINIDOKA AREA OF ENVIRONMENTAL CONCERN

In February 2023, the Friends of Minidoka petitioned the BLM to designate the Greater Minidoka Area of Environmental Concern (Minidoka ACEC).[4] The proposed Minidoka ACEC includes approximately 237,000-acres of BLM lands surrounding the Minidoka National Historic Site and Minidoka Relocation Center, which have been proposed for the Lava Ridge Wind Project.[5] The proposed ACEC seeks to "protect a sensitive and culturally important site for Minidoka survivors, descendants, the Japanese American community, and our country. The Minidoka Relocation Center

[1] Mario Battaglia, M.A., Rebecca Hawkins, M.A., and Thomas F. King, PhD, Algonquin Consultants, Inc., dated December 2, 2022.
[2] Minidoka TCP, pp. 60-61.
[3] Letter from Idaho SHPO to Robyn Achilles, dated February 20, 2023.
[4] Joshua Vallejos, M.A., Katherine Peck, M.S., Brian Elliott, M.S., Thomas F. King, Ph.D., and Rebecca A. Hawkins, M.A., Algonquin Consultants, Inc., dated February 12, 2023.
[5] Minidoka ACEC Nomination, p. 2.

and its viewshed have been identified as a Traditional Cultural Property (TCP) eligible for inclusion in the National Register of Historic Places (NRHP),"[6] and other important public values.

MONUMENT RESOURCE MANAGEMENT PLAN -- SOLAR ENERGY ZONE AND EXCLUSION AREA

In the event that the BLM proposes to designate a Solar Energy Zone in the Monument Resource Management Plan (RMP) area/Shoshone Field Office, we recommend that the BLM work with the National Park Service, Japanese American community and local stakeholders to designate exclusion zones on BLM lands to protect Minidoka's viewshed and the park's fundamental resources and values from visual intrusions.

WIND ENERGY EXCLUSION AREA

In the event that the BLM proposes to amend the 2005 Wind Programmatic EIS to include the Monument RMP area for wind energy, we recommend that BLM exclude wind energy on BLM lands within the TCP and proposed ACEC.

UPDATE UNDERLYING LAND MANAGEMENT PLANS

The 2012 Solar PEIS exclusion categories for historic, cultural and other resources are predicated on BLM field offices carrying out FLPMA's requirements to inventory and update land use plans. In the case of Southern Idaho, the BLM's land use plans are grossly out of date. For example, the 1985 Monument Resource Management Plan was not amended to take into account the Minidoka National Historic Site and resources associated with the Minidoka Relocation Center and include required VRM categories. Without visual resource inventories, VRMs and updated land use plans, any proposed changes to the 2012 Solar Plan and 2005 Wind Plan will not achieve the proper balance between resource protection and renewable energy.

AUTHORITIES

As you consider these comments, our organizations encourage BLM to consider the following authorities relating to the preservation of Japanese American incarceration sites and other historic properties.

Minidoka National Historic Site Act of 2008. In 2008, Congress passed legislation (P.L. 110-229) to expand, redesignate the Monument as Minidoka National Historic Site, and establish the Bainbridge Island Japanese American Exclusion Memorial .[7] The law directs the that the NHS be managed "to protect, preserve, and interpret the resources associated with the former Minidoka Relocation Center …" [8] Minidoka's authorizing legislation directs the Secretary to interpret "(I) the story of the relocation of Japanese Americans during World War II to the Minidoka Relocation Center and other centers across the United States; (II) the living conditions of the relocation centers…[9]

[6] Minidoka ACEC Nomination, p. 2.
[7] P.L. 110-229, Section 313(c)
[8] P.L. 110-229, Section 313(c)(2)(A)
[9] P.L. 110-229, Section 313(c)(2)(B)(i)(I)

NPS Organic Act. Through the Organic Act, Congress established purposes for the National Park System "to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Congress directed that Minidoka be administered in accordance with the Organic Act and other "laws (including regulations) generally applicable to units of the National Park System." [10]

Historic Sites Act of 1935, as amended. Minidoka's authorizing legislation (P.L.110-229) directs that Minidoka NHS be managed in accordance with the Historic Sites Act.[11] Section 1 of the Historic Sites Act declares that it is national policy "to preserve for public use historic sites, buildings, and objects of national significance for the inspiration and benefit of the people of the United States."[12] Because it is a unit of the National Park System, Minidoka is deemed nationally significant. [13] Section 2 of the Historic Sites Act states that "The Secretary of the Interior (hereinafter in sections 1 to 7 of this Act referred to as the Secretary), through the National Park Service, for the purpose of effectuating the policy expressed in section 1 of this Act, shall have the following powers and perform the following duties and functions: … (f) Restore, reconstruct, rehabilitate, preserve, and maintain historic or prehistoric sites, buildings, objects, and properties of national historical or archaeological significance …"

Japanese American Confinement Sites Act. In 2006, Congress passed bipartisan legislation "to provide for the preservation of the historic confinement sites where Japanese Americans were detained during World War II." [14] Known as the Japanese American Confinement Sites Act (JACS), the Act directed the Secretary of the Interior to:

> … create a program within the National Park Service to encourage, support, recognize, and work in partnership with citizens, Federal agencies, State, local, and tribal governments, other public entities, educational institutions, and private nonprofit organizations for the purpose of identifying, researching, evaluating, interpreting, protecting, restoring, repairing, and acquiring historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nation's commitment to equal justice under the law." [15]

Norman Y. Mineta Japanese American Confinement Education (JACE) Act. In 2022, Congress passed the JACE Act (P.L. 117-328) to "provide competitive grants for the promotion of Japanese American confinement education as a means to understand the importance of democratic principles, use and abuse of power, and to raise awareness about the importance of cultural tolerance toward Japanese Americans, and for other purposes." The law reauthorized the JACS grant program, which includes the

[10] P.L. 110-229, Section 313(c)(5)(A)(ii)(I)

[11] P.L. 110-229, Section 313(c)(5)(A)(ii)(II).

[12] 16 U.S.C. 461

[13] National Park Service, 2012, "Japanese Americans in World War II Theme Study, p. 154 <<link to non-federal website removed per DOI policy>>. "As a National Monument and a unit of the National Park System, the site has been determined nationally significant." [14] See: P.L. 109-441

[15] P.L. 109-441, Section 1(a) Emphases added.

Minidoka Relocation Center as an eligible confinement site, and created a new program to support museum education.

Japanese American World War II History Network. In 2022, Congress passed legislation (P.L. 117-328) to establish the new Japanese American World War II History Network.[16]

National Historic Preservation Act – Section 110 compliance. The NHPA states that it "is the policy of the Federal Government, in cooperation with other nations and in partnership with States, local governments, Indian tribes, Native Hawaiian organizations, and private organizations and individuals, to … (3) administer federally owned, administered, or controlled historic property in a spirit of stewardship for the inspiration and benefit of present and future generations…"

National Environment Policy Act (1969): In addition to its procedural requirements, NEPA includes a Congressional declaration of National Environmental Policy to: "…create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans."[17] NEPA also includes a substantive requirement to preserve historic sites: "it is the continuing responsibility of the Federal Government to use all practicable means … [to] preserve important historic, cultural and natural aspects of our national heritage.[18] NEPA's substantive direction to preserve historic sites was further clarified by Executive Order 11593.[19]

Protection and enhancement of the cultural environment Executive Order 11593 (1971). Executive Order 11593 establishes a federal policy that "[t]he Federal Government shall provide leadership in preserving, restoring and maintaining the historic and cultural environment of the Nation. Agencies of the executive branch of the Government (hereinafter referred to as "Federal agencies") shall (1) administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations, (2) initiate measures necessary to direct their policies, plans and programs in such a way that federally owned sites, structures, and objects of historical, architectural or archaeological significance are preserved, restored, and maintained for the inspiration and benefit of the people…" [20]

Preserve America Executive Order 13287 (2003). The Preserve America Executive Order states that it is federal policy to "provide leadership in preserving America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government … and fostering a broader appreciation for the development of the United States and its underlying values … executive branch departments and agencies (''agency'' or ''agencies'') shall advance this policy through the protection and continued use of the historic properties owned by the Federal Government." [21]

---

[16] P.L. 117-328, Division DD—Public Land Management, Section 645

[17] See: 42 U.S.C. 4331(a).

[18] See: 42 U.S.C. 4331(b)(4).

[19] Monument RMP, p. 41.

[20] https://www.archives.gov/federal-register/codification/executive-order/11593.html

[21] https://www.achp.gov/digital-library-section-106-landing/preserve-america-executive-order-13287. Section 1 Statement of Policy. "It is the policy of the Federal Government to provide leadership in preserving America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government, and by promoting intergovernmental cooperation

Environmental Justice EO 12898 (1994) – Achieving environmental justice. The Environmental Justice Executive Order states that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations …."[22]

Anti-discrimination provisions. In addition to the affirmative mandate to promote environmental justice, the Environmental Justice EO directs federal agencies to manage their programs so that they do not have the effect of "…subjecting persons (including populations) to discrimination under, such programs, policies, and activities, because of their race, color, or national origin."[23]

Advancing Racial Justice Executive Order (E.O. 13895). On January 20, 2021, President Biden signed a "Day One" Executive Order entitled "Advancing Racial Equity and Support for Underserved Communities through the Federal Government." The EO states that "[a]ffirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government."[24] The EO states that underserved communities who have been denied "fair, just, and impartial treatment" includes "Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color."[25]

To implement the Advancing Racial Justice EO 13895, Secretary Haaland highlighted President Biden's Fiscal Year 2022 budget request to Congress which included funding increases for National Parks, including Minidoka NHS and other incarceration sites, that tell the stories of underrepresented communities.[26] The President's FY 2023 Budget request proposed "$48 million across the National Park

---

and partnerships for the preservation and use of historic properties. The Federal Government shall recognize and manage the historic properties in its ownership as assets that can support department and agency missions while contributing to the vitality and economic well-being of the Nation's communities and fostering a broader appreciation for the development of the United States and its underlying values. Where consistent with executive branch department and agency missions, governing law, applicable preservation standards, and where appropriate, executive branch departments and agencies (''agency'' or ''agencies'') shall advance this policy through the protection and continued use of the historic properties owned by the Federal Government, and by pursuing partnerships with State and local governments, Indian tribes, and the private sector to promote the preservation of the unique cultural heritage of communities and of the Nation and to realize the economic benefit that these properties can provide"

[22] Environmental Justice EO 12898: "Section 1–1. Implementation. 1–101. Agency Responsibilities."

[23] Environmental Justice EO 12898: "Sec. 2–2. Federal Agency Responsibilities for Federal Programs. Each Federal agency shall conduct its programs, policies, and activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under, such programs, policies, and activities, because of their race, color, or national origin."

[24]See: Whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/

[25] See: Section 2 "Definitions", EO 13895.

[26] See: Statement by Secretary Haaland on the President's FY 22 Discretionary Funding Request. https://www.doi.gov/news/statement-secretary-haaland-presidents-fy22-discretionary-funding-request," dated 4/9/2021. See also: See: NPS FY 22 "Greenbook" Budget Justification, p. Overview 12

Service to advance racial justice and equity for underserved communities, including $14.3 million for operational increases at parks that preserve the stories of under-represented communities," including Minidoka NHS.[27]

Executive Order on Tackling the Climate Crisis at Home and Abroad-- Environmental Justice. While the Climate Crisis EO establishes nationwide goals for renewable energy, it also requires that the response to climate change deliver environmental justice and not at the expense of the environmental justice communities.[28]

Executive Order on Advancing Equity, Justice and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islands.[29] On May 28, 2021, President Biden signed Executive Order 14031 to establish the White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders (WHIAANHPI)[30] The EO directed the Initiative to "advance equity, justice, and opportunity for AA and NHPI communities by coordinating Federal interagency policymaking and program development efforts to eliminate barriers to equity, justice, and opportunity faced by AA and NHPI communities, including by advancing policies, programs, and initiatives."[31] Approval of our recommended comments would further the E.O.'s direction to: "promote inclusion and belonging for AA and NHPI communities, including by expanding public education and knowledge of AA and NHPI people and their diverse cultures, languages, and histories." [32]

In January 2023, the White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders released "collected action plans from 32 federal agencies, which collectively represent the Biden-Harris Administration's national strategy to advance equity, justice, and opportunity for Asian American, Native Hawaiian, and Pacific Islander communities.[33] The January 2023 Report to the President highlights WHIAANHPI's goals including: "… promote inclusion and belonging for AA and NHPI communities,

---

[27] https://www.doi.gov/pressreleases/president-bidens-fiscal-year-2023-budget-makes-181-billion-investment-interior

[28] https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/ . Part II – Taking a Government-Wide Approach to the Climate Crisis, Sec. 201 states that "[i]t is the policy of my Administration to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach that reduces climate pollution in every sector of the economy; increases resilience to the impacts of climate change; protects public health; conserves our lands, waters, and biodiversity; delivers environmental justice; and spurs well-paying union jobs and economic growth, especially through innovation, commercialization, and deployment of clean energy technologies and infrastructure

[29] https://www.whitehouse.gov/briefing-room/presidential-actions/2021/05/28/executive-order-on-advancing-equity-justice-and-opportunity-for-asian-americans-native-hawaiians-and-pacific-islanders/

[30] E.O. 14031, Section 3

[31] E.O. 14031, Section 3(b)

[32] E.O. 14031, Section 3(b)(iii)

[33] https://www.whitehouse.gov/briefing-room/statements-releases/2023/01/17/fact-sheet-biden-harris-administration-continues-to-uplift-asian-american-native-hawaiian-and-pacific-islander-communities/
A NATIONAL STRATEGY TO ADVANCE EQUITY, JUSTICE, AND OPPORTUNITY FOR ASIAN AMERICAN, NATIVE HAWAIIAN, AND PACIFIC ISLANDER COMMUNITIES, dated January 2023, "On May 28, 2021, President Joe Biden signed Executive Order 14031, establishing the White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders. In its first year, the Initiative collected action plans from 32 federal agencies, which collectively represent the Biden-Harris Administration's national strategy to advance equity, justice, and opportunity for Asian American, Native Hawaiian, and Pacific Islander communities."
https://www.whitehouse.gov/wp-content/uploads/2023/01/AA-and-NHPI-Strategy-2023.pdf

including by expanding public education and knowledge of AA and NHPI people and their diverse cultures, languages, and histories."[34]

In January 2023, the U.S. Department of the Interior issued a fact sheet which stated: "[p]er Executive Order 14031, DOI has identified five high-priority goals that will span the next two years. These goals will advance equity, justice, and opportunity for AA and NHPI communities … GOAL 4 Promote equity and inclusion by ensuring the history of AA and NHPIs is part of America's storytelling."[35]

Presidential Proclamation "Day of Remembrance of Japanese American Incarceration During World War II, February 18, 2022" To commemorate the signing of EO 9066, President Joe Biden noted that: "the National Park Service helps preserve several Japanese American incarceration camps. These tangible reminders of our history provide important spaces for reflection and learning about the injustices born of prejudice. Preserving incarceration sites as national parks and historic landmarks is proof of our Nation's commitment to facing the wrongs of our past, to healing the pain still felt by survivors and their descendants, and to ensuring that we always remember why it matters that we never stop fighting for equality and justice for all. My Administration is committed to maintaining these national parks and landmarks for future generations and to combating xenophobia, hate, and intolerance — including through the reestablished White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders. In the words of Dr. Frank Kitamoto, who was incarcerated as a child, 'This is not just a Japanese American story but an American story with implications for the world.'" [36]

We hope these authorities will help you consider our comments. Thank you for considering our views.

Sincerely,

Japanese American Citizens League (JACL)
Japanese American National Museum (JANM)
Japanese American Museum of Oregon (JAMO)
Bainbridge Island Japanese American Exclusion Memorial Association
Coalition to Protect America's National Parks
Densho
Fred T. Korematsu Institute
Friends of Minidoka
Heart Mountain Wyoming Foundation
Manzanar Committee
Minidoka Pilgrimage Planning Committee
National Japanese American Memorial Foundation (NJAMF)
National Parks Conservation Association

---

[34] "Policy Goals and Strategic Priorities," WHIAANHPI Report to President on a National Strategy to Advance Equity, Justice and Opportunity for Asian American, Native Hawaiian, and Pacific Islander Communities, dated January 2023, p. 16
https://www.whitehouse.gov/wp-content/uploads/2023/01/WHIAANHPI-2023-Report-to-the-President-FINAL.pdf
[35] U.S. Department of the Interior, Agency Plan, dated January 2023
https://assets.performance.gov/communities/equity/2023/action-plans/WHIAANHPI/EO_14031_DOI_AANHPI_Plan_2022.pdf
[36] https://www.whitehouse.gov/briefing-room/presidential-actions/2022/02/18/day-of-remembrance-of-japanese-american-incarceration-during-world-war-ii/#content

Nisei Veterans Committee (NVC)
Tadaima 2023
Topaz Museum Board
Tule Lake Committee
Tunupa Cattle

JACL Chapters
Alaska Chapter of the Japanese American Citizens League
Berkeley JACL
Boise Valley Japanese American Citizens League
Cincinnati Chapter JACL
Dayton Chapter Japanese American Citizens League
Idaho Falls Japanese American Citizens League
JACL Detroit Chapter
Japanese American Citizens League - SELANOCO Chapter, California
Japanese American Citizens League DC Chapter
Japanese American Citizens League Philadelphia Chapter
Japanese American Citizens League-Southeast Chapter
Japanese American Citizens League, Arizona Chapter
Japanese American Citizens League, Florin-Sacramento Valley Chapter
Japanese American Citizens League, Twin Cities Chapter
Japanese American Confinement Sites Consortium
Puyallup Valley JACL
Seabrook Chapter JACL
Seattle Japanese American Citizens League (JACL)
South Bay Japanese American Citizens League
Tulare County JACL Chapter

cc: Karen Kelleher, BLM State Director
Mike Courtney, BLM Twin Falls District Manager

United States Department of the Interior
NATIONAL PARK SERVICE
Minidoka National Historic Site

September 12, 2021

Dear Friends,

As you may have heard, a large-scale wind energy project, Lava Ridge (<<link to non-federal website removed per DOI policy>>), has been proposed on Federal lands immediately north of Minidoka National Historic Site (NHS) in southern Idaho. This letter summarizes what has been proposed, the NPS's role, the potential impacts the project might have on Minidoka NHS if constructed, and how you can participate in the compliance processes.

Minidoka:
Minidoka was listed in the National Register of Historic Places on August 18, 1979 and designated a unit of the national park system in 2001. Minidoka NHS preserves approximately 500 acres of the original 33,000-acre Minidoka War Relocation Center and interprets the stories and lives of the individuals incarcerated there and its important civil rights lessons. During World War II, nearly 13,000 Japanese Americans from Alaska, Washington, Oregon, and California were incarcerated at Minidoka War Relocation Center between 1942 and 1945. The relocation center contained more than 600 buildings, 36 residential blocks, schools, fire stations, and a hospital. Throughout the late 1940s and early 1950s, plots of land, buildings, and even furniture that once made-up Minidoka were given away in lotteries by the U.S. Bureau of Reclamation to returning World War II veterans as homesteads and farms. Today, the irrigated fields and agricultural landscape remain an enduring legacy of the communities once incarcerated at Minidoka War Relocation Center. Minidoka's unique national role is explained in the statement of significance for the site's listing on the National Register of Historic Places:

STATEMENT OF SIGNIFICANCE

The ruins of Camp Minidoka, a Japanese-American interment camp during World War II, are tangible reminders of one of the most serious and painful contradictions of our country's philosophy of freedom. Through a nefarious legal fiction, over 110,000 loyal Americans were wrenched from their homes and forcefully detained without due process of law, in bleak, barbed-wire enclosed camps scattered over isolated inland areas on desolate tracts of Federal land. The concrete slabs, dilapidated shacks, and scattered refuse surrounded by rich farmland--much of it reclaimed by the camp's inmates, is also a memorial to the suffering and remarkable courage of the Japanese-Americans of that time.

Despite being less than 50-years old, this site represents an exceptional chapter in the history of the United States that should always be remembered. Commemoration of this event should take place before memories fade and the sharpness of the event is dulled by time.

Proposed Lava Ridge Windfarm:
The Bureau of Land Management (BLM) administers the public lands where the Lava Ridge Project is proposed to be sited, including a significant portion of Minidoka's historic 33,000 footprint. Magic Valley Energy, a subsidiary of LS Power (<<link to non-federal website removed per DOI policy>>), has petitioned the BLM seeking authorization to construct, operate, maintain, and decommission this project, which is anticipated to have a 30-year lifespan. The project would span approximately 76,000 acres and includes constructing up to 400 individual towers at 740' tall each. For comparison, the Statute of Liberty is 305 feet, and the Seattle Space Needle is 605 feet. The turbine blades would exceed the wingspan of a Boeing 747. A portion of the Project, including 8,533 acres and approximately 14 turbines, would be located within the historic boundary of the original War Relocation Center. We estimate ~324 of the 400 towers will be viewable from the Minidoka NHS Visitor Center and towers will span ~115 degrees of the viewshed looking north from the Visitor Center. The project also proposes seven substations, over 200 miles of transmission lines, battery storage facilities, maintenance facilities, and 400+ miles of roads and crane walking paths.

BLM Compliance Process:
There are two primary laws the BLM is required to follow as they evaluate whether to grant authorization for this proposed project: the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). To comply with NEPA, the BLM is preparing an Environmental Impact Statement (EIS) which will identify potential issues related to the project, analyze those impacts, disclose them to the public, and use this information to make informed decisions. Concurrently, the BLM is implementing Section 106 of NHPA which identifies and assesses the effects of the project on historic properties, including Minidoka NHS, and seeks to resolve those affects through mitigation. Both are underway at present, with the NHPA slightly ahead of the NEPA process.

National Park Service Role and Concerns:
The National Park Service (NPS) is a Cooperating Agency on the NEPA/Environmental Impact Statement process and is a Consulting Party on the NHPA/Section 106 process for the Lava Ridge Project. The NPS's role is to provide subject matter expertise on the impacts to resources and values associated with Minidoka NHS, as well as Craters of the Moon National Monument and Preserve and the Oregon Trail.

The NPS has several concerns related to potential impacts from this project on Minidoka NHS, primary amongst them is the potential for this project to negatively affect the historical integrity of Minidoka NHS, especially the setting, feeling, and association. During World War II, incarceration centers were intentionally placed in remote locations away from population centers, on large tracts of land, with the ability to provide work opportunities for the incarcerated Japanese Americans. At Minidoka, Japanese Americans built irrigation canals and transformed thousands of acres into productive agricultural lands within the 33,000-acre camp. The isolated and undeveloped setting was a defining characteristic of the unjust incarceration experience at Minidoka. Today, the remote and agricultural landscape contributes to the site's historical integrity.

As proposed, the Lava Ridge Project would fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS, as the lands north would be transformed into a large-scale renewable energy site marked by hundreds of wind turbines, transmission towers and associated ancillary infrastructure. Approaching the site and walking its grounds, visitors would no longer experience the feeling of a rural, undeveloped landscape recalling what Minidoka was like during World War II. Additionally, the night skies at Minidoka are integral to its cultural and historical fabric. The NPS is concerned that night skies will be impacted by light sources emanating from the project thereby altering visitors' experience and capacity to see the nightscapes experienced by those who lived at the camp during World War II.

How You Can Participate:
The BLM is currently accepting comments as part of the NEPA scoping phase through (at least) September 20, 2021. Your comments on any aspect of this project are welcomed and encouraged at this time. To submit comments email them to BLM_ID_LavaRidge@blm.gov, by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352, or visit https://go.usa.gov/xFKxg which include the project plan of development, maps, and supporting information.

You can also request, as part of the NHPA/Section 106 process, to be deemed a "Consulting Party" which allows you to keep apprised of the project and involved in discussions about adverse effects to Minidoka NHS. Here too please contact Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352, via email at kprestwich@blm.org, or via phone at (208) 732-7204.

Lastly, I am available to meet with any individual or group who wish to discuss this project and can be reached at Wade_Vagias@nps.gov or via my cell phone at (406) 581-1367.

Sincerely,

Wade M. Vagias, PhD
Superintendent
Craters of the Moon National Monument & Preserve
Hagerman Fossil Beds National Monument
Minidoka National Historic Site

THE COALITION TO PROTECT
AMERICA'S NATIONAL PARKS
VOICES OF EXPERIENCE

ELECTRONIC TRANSMISSION – NO HARD COPY TO FOLLOW
Submitted on-line at:
<<link to non-federal website removed per DOI policy>>

March 10, 2023

Bureau of Land Management
Idaho State Office
1387 S. Vinnell Way
Boise, Idaho 83709

Subject: Bureau of Land Management (BLM) Idaho Renewable Energy Strategy

Dear Idaho State Office:

I am writing to you on behalf of the Coalition to Protect America's National Parks (Coalition). Our membership is comprised entirely of National Park Service (NPS) retirees, former and current employees, and NPS volunteers, who collectively represent more than 45,000 years of national park management and stewardship experience. The Coalition studies, educates, speaks, and acts for the preservation of America's National Park System. Among our members are former NPS directors, regional directors, superintendents, resource specialists, rangers, maintenance and administrative staff, and a full array of other former employees, volunteers, and supporters.

GENERAL COMMENTS

First, we commend BLM for undertaking a review of its Renewable Energy Strategy (Strategy) in Idaho. In our view, the current project screening process for evaluating renewable energy proposals in Idaho has been highly ineffective, with the current Lava Ridge Wind Project (Project) being a prime example of its shortcomings. A proper screening process would have denied or redirected the Project to another location when it was first proposed because of its proximity and unavoidable conflicts with the historical and cultural values of Minidoka National Historic Site (Minidoka) and the surrounding landscape. Instead, the Project proponent, BLM, and many stakeholders have invested considerable time, energy, and expense in the complicated and lengthy planning process so far. It is inevitable that whatever BLM decides to do with the Project after such a process, some party or parties will be extremely disappointed with the decision.

However, such an outcome could easily have been avoided if BLM Idaho had in place an effective Renewable Energy Strategy that accomplished the following:

1. Identify "exclusion areas" that are off-limits for utility-scale renewable energy development – When considering new renewable energy project proposals, the first priority of the Strategy should be to avoid major conflicts with the protection of other resources and uses through the exclusion of specific categories of lands from utility-scale solar energy development. We recommend an approach similar to that described in the Record of Decision (ROD) for the 2012 Western Solar Plan[1].

Similar to the Solar Plan, the Idaho Strategy should "exclude categories of lands from utility-scale energy development and identify specific locations well suited for utility-scale production of solar energy, where the BLM would prioritize development." As explained in the ROD (p. 37), "[t]he identification of exclusion areas allows the BLM to support the highest and best use of public lands by avoiding potential resource conflicts and reserving for other uses public lands that are not well suited for utility-scale [renewable] energy development. Due to the size and scale of utility scale [renewable] energy development (typically involving a single use of public lands), the BLM is excluding a broader set of categories than would be identified in a land use plan for other types of ROWs." The Idaho Strategy should include a comprehensive list of "exclusions" that is closely similar to those listed in Table A-2 on pp. 38-40 of the ROD.

Similar to Table A-2, BLM Idaho should exclude renewable energy projects in, near, or adjacent to special protected areas such as units of the National Park System and National Trail System, designated wilderness, National Historic and Natural Landmarks, properties listed in the National Register of Historic Places (NRHP), Traditional Cultural Properties (TCPs), Native American sacred sites, units of the BLM National Landscape Conservation System, and Areas of Critical Environmental Concern (ACECs). In the relatively stark, open landscapes that are typical of public lands in Idaho, visual resource impacts of renewable energy projects are a prominent concern, especially with wind energy projects because of the size/scale of modern wind turbines. As a result, BLM should also exclude renewable energy projects in all VRM Class I, II, and III areas. In addition, BLM should establish standard set-back distances (i.e., exclusion zones) around the various special protected areas listed above to ensure avoidance of impacts occurs. We recommend a minimum 10-mile exclusion zone around all special protected areas for solar energy projects and 20 miles for wind energy projects. Avoidance of conflicts with other resources and uses should be the first priority of the Idaho Strategy; and these exclusions would ensure that avoidance actually occurs.

2. Identify "priority areas" (or development zones) for renewable energy projects that are well suited for utility-scale renewable energy production – The Idaho Strategy should identify specific locations or zones that are well suited for utility-scale renewable energy production in locations that are not in conflict with exclusion areas. In principle, "priority areas" would be locations where the BLM has prioritized development because they have high potential for renewable energy development and low potential for significant conflict(s) with the protection of other resources and uses. These "priority areas" could be generally referred to as "renewable energy zones" (or REZs) or specifically as "solar energy zones" (SEZs) and "wind energy Zones" (WEZs).

If BLM truly intends to promote the use of "priority areas" with high potential for renewable energy generation and low potential for resource conflicts, then BLM needs to establish a suite of effective incentives to encourage such use. As the old saying goes, "time is money, and money is time." In this case, we believe the most effective incentives relate to either time, such as how long it takes to process an application or conduct a NEPA review; or to money, such as how much are project fees or acreage rental rates for priority vs. low priority projects.

[1] https://solareis.anl.gov/documents/docs/Solar_PEIS_ROD.pdf

BLM should consider the following incentives:

a. Expedited and streamlined NEPA reviews of projects proposed in "priority areas." In principle, "priority areas" should be pre-identified and pre-screened locations with "high potential for renewable energy generation and low potential for resource conflicts." This should allow for less complicated and time-consuming NEPA reviews.
b. Projects outside of "priority areas" should be prohibited or at least strongly discouraged through disincentives.
c. Projects located in "priority areas" should have a lower right-of-way (ROW) grant application processing fees, lower acreage rent and megawatt (MW) capacity fees, and lower performance and reclamation bonds compared to projects in "variance areas," if such development is even allowed. (See comment # 3 below.) Charging lower fees for projects located within priority areas is reasonable given that such locations will have already been determined as having a "high potential for renewable solar energy generation and low potential for resource conflicts" compared to variance area locations, if allowed.
d. Lastly, projects, if allowed outside of "priority areas," should have more extensive post-development monitoring and reporting requirements than those located in the "priority areas."

3. Minimize the use and expansiveness of "variance areas" that are potentially available for utility-scale renewable energy development outside of "priority areas" – The Western Solar Plan (Plan) identified a third category of zoning referred to as "variance areas" that are located outside of both exclusion areas and priority energy development areas. The designation of "variances areas" was apparently intended to provide developers with increased flexibility in their site selection options. However, a significant problem with the Western Solar Plan is that the majority of energy project applications have actually occurred in "variance areas" rather than in "priority areas." As a practical matter, the designation of "priority areas" (or "zones") for energy development can only accomplish their intended objective if developers actually use them. Instead, under the Western Solar Plan, BLM has allowed so much development of solar energy projects in "variance areas" that it has become the "norm" and not the "exception" one would expect a "variance" to be. We therefore urge BLM to limit the use and expansiveness of any "variance areas," if such a concept is included in the Idaho Strategy – after all, there are undoubtedly good reasons why these areas were not identified as "priority areas."

4. Establish mandatory programmatic and location-specific design features and mitigation measures for renewable energy development on public lands to ensure the most environmentally responsible development and delivery of renewable energy – We recommend that BLM Idaho consider, update, and adapt to its own circumstances the programmatic and location-specific design features for solar energy projects that are described in Western Solar Plan Table A-4 (Programmatic Design Features) and Table A-5 (Solar Energy Zone-Specific Design Features). Unfortunately, BLM's 2005 Wind Energy Programmatic Environmental Impact Statement (PEIS)[2], does not include a concise description or list of programmatic or site specific design features or mitigation measures for utility scale wind energy projects. We recommend that BLM Idaho collaborate with the National Renewable Energy Laboratory (NREL) to consider, update, and adapt appropriate guidance for wind energy design features in Idaho. However, please understand that while effective design features and mitigation measures are important, they cannot compensate for the impacts of a poorly sited utility-scale project such as Lava Ridge. It is far more important that BLM make good siting decisions in the first place through the identification of exclusions areas and priority development areas as described in Items # 1 and # 2 above.

In addition to the above, BLM Idaho should reconsider its definition of "utility scale" renewable energy

[2] https://windeis.anl.gov/documents/fpeis/maintext/vol1/vol1complete.pdf

projects. A review of available information indicates that the definition of "utility-scale solar" is typically determined by size based on the amount of energy generated. However, definitions vary widely and there is no generally accepted definition of the term "utility-scale" with regards to renewable energy projects. For example, the U.S. Energy Information Administration (EIA)[3] considers "utility-scale electricity generation" to be electricity generation from power plants with at least 1 megawatt (MW) of total electricity generating capacity. Similarly, the Solar Energy Industries Association[4] defines a solar project as "utility-scale" if it has a generation capacity of 1 megawatt (MW) or larger. In contrast, the National Renewable Energy Laboratory has defined "utility-scale" solar energy projects as being 5 megawatts (MW) or larger[5]. To add to the confusion, the Department of Energy defines "utility-scale renewable energy projects as those 10 megawatts or larger"[6].

BLM's current definition of utility scale projects as being those that "generate 20 MW or more" is clearly outdated and inflated compared to definitions used by federal energy agencies, as well as that used by the solar energy industry. In principle, the Idaho Strategy should apply to all commercial renewable energy projects proposed for development on public lands. We therefore recommend that BLM redefine the term as follows: "In the context of the Idaho Renewable Energy Strategy, "***utility scale*** means any project capable of generating with at least 1 megawatt (MW) of electricity that is delivered into the electricity transmission grid."

COMMENTS ON QUESTIONS POSED BY BLM

1. What resource values are you concerned about?

We are most concerned about the impacts of renewable energy projects on nearby special protected areas such as units of the National Park System and National Trail System, designated wilderness, National Historic and Natural Landmarks, properties listed in the National Register of Historic Places (NRHP), Traditional Cultural Properties (TCPs), Native American sacred sites, units of the BLM National Landscape Conservation System, and Areas of Critical Environmental Concern (ACECs). As stated previously, in the relatively stark, open landscape(s) of public lands in Idaho, visual resource impacts of renewable energy projects are a prominent concern, especially with wind energy projects because of the size/scale of modern wind turbines. As a result, BLM Idaho should exclude renewable energy projects in all VRM Class I, II, and III areas. In addition, BLM should establish exclusion zones around the various special protected areas listed above to ensure avoidance of impacts. We recommend a minimum 10-mile exclusion zone around all special protected areas for solar energy projects and 20 miles for wind energy projects. Avoidance of conflicts with other resources and uses should be the first priority of the Idaho Strategy; and these exclusions would ensure that avoidance occurs.

2. Are there locations/regions that may be desirable for alternative energy siting? Where? Why?

We have no site-specific comments or information to offer. Determining the potential of any location for renewable energy production should be based on scientific studies and documentation, such as wind resource maps. In principle, the hierarchy for decision making on alternative energy siting should be: 1) avoid all identified "exclusion areas"; 2) utilize to the extent possible only "priority areas" for renewable energy development that have been identified as having "high potential for renewable energy development and low potential for conflicts with the protection of other resources and uses"; and 3) minimize the use and expansiveness of "variance areas" – after all, there are undoubtedly good reasons why they were not identified as "priority areas."

---

[3] https://www.eia.gov/tools/faqs/faq.php?id=427&t=8

[4] <<link to non-federal website removed per DOI policy>>

[5]

[6] https://www.energy.gov/scep/slsc/renewable-energy-utility-scale-policies-and-programs#:~:text=Utility-scale%20renewable%20energy%20projects%20are%20typically%20defined%20as,to%20address%20and%20overcome%20potential%20barriers%20to%20implementation

3. Are there locations/regions that are of concern? Where? Why?

As stated previously, we are most concerned about the impacts of renewable energy projects on nearby special protected areas such as units of the National Park System and National Trail System, designated wilderness, National Historic and Natural Landmarks, properties listed in the National Register of Historic Places (NRHP), Traditional Cultural Properties (TCPs), Native American sacred sites, units of the BLM National Landscape Conservation System, and Areas of Critical Environmental Concern (ACECs). In the relatively stark, open landscapes of public lands in Idaho, visual resource impacts of renewable energy projects are a prominent concern, especially with wind energy projects because of the size/scale of wind turbines. As a result, BLM should exclude renewable energy projects in all VRM Class I, II, and III areas. In addition, BLM should establish exclusion zones around the various special protected areas listed above to ensure avoidance of impacts. We recommend a minimum 10-mile exclusion zone around all special protected areas for solar energy projects and 20 miles for wind energy projects. Avoidance of conflicts with other resources and uses should be the first priority of the Idaho Strategy and these exclusions would ensure that avoidance occurs.

4. Is there anything else BLM should be considering in this process?

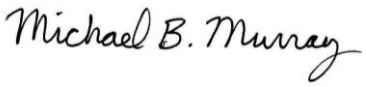
Based on the respective planning schedules, BLM Idaho will complete its Renewable Energy Strategy well before it completes the final environmental impact statement (FEIS) for the Lava Ridge Wind Project (Project). As part of your ongoing review of issues and concerns related to the Project, we recommend that you apply the Strategy to Lava Ridge to help inform your determination if the Project should move forward at its proposed location and size.

CLOSING COMMENT

In conclusion, we commend BLM Idaho for proposing to develop a Renewable Energy Strategy to help guide siting decisions for renewable energy projects on public lands in Idaho. We encourage BLM Idaho to ensure "avoidance" of impacts of renewable energy projects on special protected areas is its first priority by including in the Strategy a definitive list of "exclusion areas" that are closed to renewable energy projects; clearly identifying and incentivizing the use of "priority areas" that have a high potential for renewable energy development and a low potential for conflict with other resources and uses; and, outside of exclusions areas and priority areas, minimizing or avoiding the use of expansive "variance areas" that are potentially available for development – after all, there are undoubtedly good reasons why these areas were not identified as "priority areas."

We appreciate the opportunity to comment on the proposed Strategy.

Sincerely,



Michael B. Murray
Chair of the Executive Council
Coalition to Protect America's National Parks
Email: Editor@protectnps.org
Mail: 2 Massachusetts Ave NE, Unit 77436, Washington, DC 20013
Web: <<link to non-federal website removed per DOI policy>>
Phone: (202) 819-8622

IDAHO GOVERNOR'S OFFICE OF ENERGY & MINERAL RESOURCES

BRAD LITTLE
Governor

RICHARD STOVER
Administrator

304 N. 8th Street, Suite 250
P.O. Box 83720
Boise, Idaho 83720-0199

(208) 332-1660
FAX (208) 332-1661

March 10, 2023

Bureau of Land Management
Idaho State Office
1387 South Vinnell Way
Boise, ID 83709

Subject: Request for Comments Regarding the Bureau of Land Management's Idaho State Office Renewable Energy Strategy

The U.S. Department of the Interior Bureau of Land Management (BLM) intends to refine its approach to renewable energy project applications to assist applicants prior to proposing renewable energy projects on public land in southern Idaho. BLM intends to develop this strategy in response to the increased interest in renewable energy on public lands.

Thank you for the opportunity to provide comments on the BLM's Idaho State Office Renewable Energy Strategy. OEMR submits these comments on behalf of the state of Idaho pursuant to its responsibility to coordinate all state comments involving energy resources in accordance with Executive Order 2020-17.

What resource values are you concerned about? Are there locations/regions that are of concern? Where? Why?
The state of Idaho requests that the BLM's Idaho State Office review the state of Idaho's comments regarding the solar programmatic EIS that were submitted to the BLM's ePlanning page on March 1, 2023, for an overview of resource values and locations of concern regarding renewable energy development. The state of Idaho's comments regarding the solar programmatic EIS is included below.

Are there locations/regions that may be desirable for alternative energy siting? Where? Why?
The state of Idaho recommends that the BLM continue to prioritize the importance of multiple uses on public land within Idaho, especially recreational and agricultural uses. Future applicants should note if renewable energy development constitutes an exclusion of prior public land uses.

Is there anything else BLM should be considering in this process? Please explain.
The state of Idaho requests BLM and project applicants engage with the Idaho Governor's Office of Energy and Mineral Resources at the earliest and highest levels of planning for all future proposed projects covered by the BLM's Idaho Renewable Energy Strategy.

Future applicants should use the most recent state-verified data available when analyzing future project placement and effects to resources.

The applicant should be required to consider cumulative effects of other proposed projects in addition to their project early in the process to ensure a cohesive regional approach to development.

Applicants should initiate robust communication and outreach with local communities as early as possible for improved renewable energy development applications.

The state of Idaho appreciates the opportunity to submit these comments. Please feel free to contact me should you have any questions or need clarification.

Sincerely,

Richard Stover
Administrator
Office of Energy and Mineral Resources

Attachment to Feedback from Idaho Governors Office Of Energy & Mineral Resources

IDAHO GOVERNOR'S OFFICE OF ENERGY & MINERAL RESOURCES

BRAD LITTLE
Governor

RICHARD STOVER
Administrator

304 N. 8th Street, Suite 250
P.O. Box 83720
Boise, Idaho 83720-0199

(208) 332-1660
FAX (208) 332-1661

March 1, 2023

Bureau of Land Management
Solar Energy PEIS Scoping
1849 C Street NW
Washington, DC 20006

Subject: Request for Comments Regarding the Bureau of Land Management's Programmatic Environmental Impact Statement for Utility-Scale Solar Energy Planning

The U.S. Department of the Interior Bureau of Land Management (BLM) intends to prepare resource management plan (RMP) amendments and an associated programmatic environmental impact statement (PEIS) for utility-scale solar energy planning on public lands across western states. This PEIS would update the 2012 Western Solar Plan (2012 WSP), which implemented policies, procedures, and plan amendments related to solar energy development in six Southwestern States. The PEIS will consider modifying the 2012 WSP framework and expanding the program to five other western states, including Idaho. BLM has requested assistance identifying issues and has provided planning criteria for review.

Thank you for the opportunity to provide comments on the BLM's PEIS for utility-scale solar energy planning. The following comments are developed in coordination with the Idaho State Department of Agriculture (ISDA), Idaho State Historic Preservation Office (SHPO), Idaho Department of Parks and Recreation (IDPR), Idaho Department of Fish and Game (IDFG), Idaho Governor's Office of Species Conservation (OSC), and Idaho Governor's Office of Energy and Mineral Resources (OEMR). OEMR submits these comments on behalf of the state of Idaho pursuant to its responsibility to coordinate all state comments involving energy resources in accordance with Executive Order 2020-17.

The state of Idaho requests BLM to engage the state as a cooperating agency at the earliest and highest levels of planning for all future proposed actions covered by the Solar PEIS, for any future utility-scale solar siting proposals. The state of Idaho has requested cooperating agency status via the contact information provided during the utility-scale solar energy planning public scoping meetings but has not received confirmation.

Governor Little and members of Idaho's congressional delegation recently addressed single use energy development on public lands in a letter to the BLM's Idaho State Director where they stated: "Idahoans cherish the concept of multiple and mixed uses on their public lands. This requires conservation, predictability of use and, most importantly, support from the local communities. These deep-rooted values are compromised by a piecemeal approach to large-scale generation projects on public lands. Dedicating hundreds of square miles of public lands to a specific use will have a long-term effect on recreation, grazing, sporting uses, and the land in

general." It is important to note again here that community support and inclusion will be paramount to any large single use energy development on public lands.

The study plan area for the 2012 WSP should be expanded to include Idaho. Renewable energy companies are proposing projects in Idaho at an unprecedented rate. Having a process that can streamline applications and focus on the most technically feasible and financially viable projects within areas that have the least resource conflicts will provide clearer business opportunities, as well as make the best use of State resources and time analyzing and permitting these projects.

Many of the federal land use plans (Resource Management and Travel Management Plans) within Idaho are from the late 1980s, or in the case of some Travel Management Plans, are nonexistent. Relying on these out of date or nonexistent plans for recreation trail locations and uses, big game winter habitat and migration corridors, invasive weed and annual grass management guidance, and other region-specific resource details will likely not be effective in evaluating an area for solar potential.

Given the number of solar and wind project applications across southern Idaho, the state of Idaho requests the BLM perform a similar PEIS and develop exclusion criteria for wind energy development.

The 2012 WSP concluded that its preferred alternative "would likely result in a high pace of development at a low cost to government, developers, and stakeholders." Please analyze how the 2012 WSP impacted the pace of solar development and whether it succeeded in lowering costs to government, developers, and stakeholders.

Examine how robust communication and outreach with local communities can occur as early as possible and improved for individual solar development applications.

Evaluate how the 2012 WSP influenced environmental impacts of solar projects as compared to projects developed prior to the implementation of the 2012 WSP. Analyze whether programmatic design features succeeded in avoiding, minimizing, or mitigating potential adverse impacts.

Please analyze performance of the variance process vis-à-vis the standard NEPA process for solar projects, and analyze how the variance process could be improved and streamlined.

The state of Idaho anticipates additional consultation with the BLM will be required under Section 106 of the National Historic Preservation Act.

Fish and Wildlife

Fish and wildlife resources and associated public recreation are culturally and economically important for Idaho's citizens. In coordination with the OEMR and OSC, IDFG is providing technical assistance to BLM about priority resources potentially affected by solar energy development.

The state of Idaho recommends BLM develop and analyze criteria that will mitigate (avoid, minimize, or offset) adverse effects on Idaho's fish, wildlife, and botanical resources. These criteria should tier to and align with State management priorities. Priority resources and associated supporting documents include:

> Big Game Species
>
> Management programs for big game, including population objectives and strategic management direction, are addressed in species management plans available on the IDFG website (<<link to non-federal website removed per DOI policy>>). Migratory big game,

including mule deer, elk, pronghorn, and bighorn sheep, are particularly relevant to infrastructure development programs, considering that project effects may extend over large areas beyond the project footprint if project activities or infrastructure reduce the effectiveness of migration routes or the sustainability of seasonal ranges. Management plans for Mule Deer and bighorn sheep were recently updated. The management plan for Pronghorn is in development, and the process for seeking Idaho Fish and Game Commission approval is anticipated in 2023. Revision of the current Elk Management Plan is anticipated to be completed in 2024.

Avoiding, minimizing, or offsetting adverse impacts on big game populations will require careful consideration of migratory patterns and uncertainties arising from data gaps. IDFG has developed migration maps for some big game migrations, which are available to support, e.g., management planning, project development, and effects analyses. Published migration maps are available in Ungulate Migrations of the Western United States, Volume 1 (Kaufmann et al. 2020); Ungulate Migrations of the Western United States, Volume 2 (Kaufmann et al. 2022); and Ungulate Migrations of the Western United States, Volume 3 (Kaufmann et al. 2022). These publications include many of IDFG's mule deer, elk, and pronghorn migrations mapped to date.

U.S. Department of the Interior Secretarial Order 3362 addresses big game migration with the goal of conserving and improving winter range and migration habitat in the West for pronghorn, mule deer, and elk. IDFG has produced an Idaho Action Plan pursuant to SO 3362, which has been updated approximately annually. This plan has a geographic framework based on a dynamic set of 5 priority areas for each iteration of the plan. IDFG regards this as an adaptable spatial framework that directs resources to areas where management opportunities are greatest.

The PEIS should align with IDFG species management plans and the SO 3362 Idaho Action Plan by analyzing the effect of land use allocations, exclusion criteria, and design features on all big game migratory populations, including considerations for migration routes and seasonal ranges. Consideration should be given to conservation investments that have been made through this program to support seasonal ranges and migration routes.

Greater Sage-Grouse

The Greater Sage-Grouse is an iconic State-managed upland gamebird. OSC is the overarching policy lead for the state of Idaho and IDFG is the technical lead. This species has an important nexus with Idaho land use. The state of Idaho is guided by Executive Order 2022-03 "Adopting Idaho's 2021 Sage-grouse Management Plan and Idaho Sage-Steppe Mitigation Principles" (<<link to non-federal website removed per DOI policy>>.

The State uses the Sage-grouse Management Plan (<<link to non-federal website removed per DOI policy>>) and Idaho Sage-Steppe Mitigation Principles (<<link to non-federal website removed per DOI policy>>) as guidance to provide recommendations when state agencies, federal agencies or stakeholders are analyzing projects that have a nexus with sage-grouse. The State regularly engages in collaborative efforts with stakeholders and federal agencies to provide input on management actions within or adjacent to sage-grouse habitat. The recommendations are based on a management continuum strategy for sage-grouse conservation through rule sets

associated with Conservation Areas and mapped Habitat Management Areas (HMAs). Priority HMAs have the most restrictive management approach and provide a high level of conservation focus on improving sage-grouse habitats, populations, and connectivity. Important HMAs provide intermediate flexibility but maintain a conservation mindset and General HMAs are the least restrictive and therefore provide greater flexibility for multiple use activities.

Species of Greatest Conservation Need (SGCN)
Idaho's State Wildlife Action Plan (SWAP) describes key conservation targets (fish and wildlife species and their habitats) and is intended to conserve fish and wildlife by helping landowners, resource-based industries, and land management agencies choose programs and on-the-ground activities that benefit those species that need the most help. SGCN, including species listed under or proposed for listing under the Endangered Species Act, should be prioritized for consideration across management programs.

IDFG has recently completed revision of Idaho's SWAP for approval by USFWS. This updated version has been approved for advancement to USFWS by the Idaho Fish and Game Commission, and review and approval by USFWS is anticipated in 2023. Chapter 3 of SWAP addresses "Challenges & Actions", summarizing resource management programs and recommended actions for supporting SGCN. Section 3.3 addresses "Energy Production & Mining," which would include utility-scale solar energy development.

The PEIS should place particular emphasis on analyzing Idaho SGCN that are (1) dependent on the sagebrush ecosystem, (2) dependent on aquatic and riparian habitat types, or (3) locally endemic to restricted or specialized habitat. Many SGCN, e.g., greater sage-grouse and pygmy rabbit, and many big game winter ranges in Idaho are associated with sagebrush and sagebrush-steppe communities. High-quality sagebrush communities generally occur in lower precipitation zones and can be slow to recover from fire disturbance.

Decisions about utility-scale solar energy development arising from the PEIS will have implications for fish, wildlife, and botanical resources and associated public recreation. Potential effects of solar energy development projects comprise direct, indirect, and cumulative effects on habitat or populations arising from infrastructure and project activities (e.g., construction, operations, and maintenance). Solar energy development may reduce the quantity, quality, and connectivity of habitat for priority wildlife if available habitat is converted by infrastructure development. Projects may adversely affect habitat use, movements, and migration behaviors if priority wildlife avoid the project's noise, infrastructure, or human activity. Avoidance of the project could reduce wildlife use of remaining habitat within and adjacent to project footprints, decreasing habitat effectiveness. Avoidance of infrastructure and activities may also alter or disrupt movement and migration routes, which may limit habitat connectivity between seasonal ranges or affect recruitment or mortality during migration.

IDFG is committed to providing technical assistance to BLM in coordination with OEMR and OSC and staff are available to provide information and technical comments throughout the PEIS and RMP amendment processes.

Wild horse populations in Idaho are often above Appropriate Management Levels (AMLs). With this in mind, the state of Idaho proposes several steps be taken when solar construction is proposed in Herd Management areas. Consultation with local permittees, state agencies, BLM wild horses and burros specialist, and any other interested parties to catalog issues caused by construction and herd population dispersion in the area. Funding be set aside to help field offices meet the AML for

wild horse population and reduce the secondhand impacts of wild horse use that have been displaced by construction activities.

Grazing

The state of Idaho supports the multiple use mission of the BLM, which for decades has included livestock grazing. In fact, public lands grazing within Idaho makes up a significant portion of Idaho's economy. The infrastructure needed for utility-scale solar energy projects on BLM land within Idaho would alter the current landscape and have a significant impact on current livestock grazing. The state of Idaho is concerned that the available animal unit months (AUMs) would be reduced or eliminated by utility-scale solar projects. Accordingly, please analyze the impact utility-scale solar projects would have on livestock grazing on BLM land in general and available AUMs specifically.

Please analyze the economic and socioeconomic impacts that the removal or displacement of the grazing permit would have economic and socioeconomic would have on rural Idaho communities. Please also consider active grazing allotments when analyzing land classifications, with preference toward exclusion.

The state of Idaho recommends that any permanent alterations to the land such as roads, wells, site installations, and any other construction be discussed with grazing permittees impacted by these changes. Discussions should include collaboration, coordination, and cooperation. Mitigating any loss the permittee might incur by AUM reductions, dewatering of water sources, spread of invasive weeds, wildfires originating from new roads, and any problems stemming from proposed construction.

Include the verbiage "coordination" when working with grazing permittees affected by proposed solar installation.

As the increase in population has limited ranchers' access to private land pasture while simultaneously raising prices for feed, the proposed two years' notice to cancel a permit is not economically feasible. The state of Idaho opposes any cancelation of grazing permits caused by solar power installation. This would represent a deviation from BLM's proposed limitation of economic and social impacts caused by solar installation. However, if a cancelation is deemed necessary, a longer cancellation notice should be provided, accompanied by financial assistance from the applicant to pay for any range improvements provided by permittee, finding alternative pasture, and moving base of operations.

Recreation

Recreation, including wheeled- and over-snow off-highway vehicle (OHV) use on public lands, contributes significantly to Idaho's economy, and that contribution continues to grow annually.

Recreational access to Idaho's public lands including BLM's 12 million acres accrues an incalculable value enhancement to its citizens' quality of life. The matter of siting of Utility Scale Solar projects on BLM lands and the possibility of displacement of recreation and natural habitats from such sites by development of projects is therefore of great concern to the state of Idaho and its recreating citizens. Idaho's recreational trail riding and sporting enthusiasts wish to see no further net loss from their public lands of motorized access and of natural habitat to enjoy.

The number of citizens seeking motorized recreational access over the remaining available ground has increased significantly. It is exceedingly important to Idahoans that access to recreation is not further diminished.

Guidance should be included in the PEIS for collaboration with state and other federal agencies, and user communities, to assess all routes and areas that may be affected, and to find new and develop new routes when retention is not possible. Customary for collaborating in any other type of planning process, such guidance should apply in this PEIS to seek solutions and alternatives when any given proposed action risks loss of public recreational access.

Exclusion and Variance Areas

The state of Idaho requests that the following criteria be analyzed and incorporated as exclusion and variance areas to guide solar development on BLM lands:

1. Analyze slope degree with regard to modern solar technology and foreseeable future developments in solar technology.
2. Analyze all Areas of Critical Environmental Concern, Special Recreation Management Areas, Class I and II Visual Resource Management lands, National Historic and Natural Landmarks, Wild, Scenic, and Recreational Rivers identified in Idaho RMPs.
3. Analyze areas within the viewshed for historic properties where the visual aspect of setting is important.
4. All designated and proposed critical habitat areas for species protected under the Endangered Species Act (ESA) of 1973 (as amended).
5. Priority Habitat Management Areas within the most up to date State or BLM sage-grouse plan.
6. Developed recreational facilities, special-use permit recreation sites (e.g., ski resorts and camps). Non developed recreation opportunity loss should be avoided and minimized to the extent possible, and if trails, routes, or access is lost, then the BLM should replace those opportunities to the extent possible.
7. Secretarially designated National Recreation, Water, or Side and Connecting Trails and National Back Country Byways (BLM State Director approved) identified in applicable BLM and local land use plans (available at <<link to non-federal website removed per DOI policy>>), including any associated corridor or lands identified for protection through an applicable land use plan.
8. Traditional cultural properties and Native American sacred sites as identified through consultation with tribes and recognized by the BLM.
9. Segments of rivers determined to be eligible or suitable for Wild or Scenic River status identified in applicable land use plans, including any associated corridor or lands identified for protection through an applicable land use plan.
10. Lands within a solar energy development application area found to be inappropriate for solar energy development through an environmental review process that occurred prior to finalization of the Draft Solar PEIS.
11. All lands within National Park Service sites (i.e., Minidoka, Nez Perce National Historic Site, etc.) and the Sawtooth National Recreation Area.
12. Lands within the boundaries of properties listed in the National Register of Historic Places (NRHP), including National Historic and Natural Landmarks, and any additional lands

outside the designated boundaries identified for protection through an applicable land use plan.

13. Expand the properties excluded from "listed in the National Register of Historic Places" in exclusion area 23 to "listed or eligible for listing in the National Register."

The state of Idaho is committed to providing technical assistance to the BLM and staff are available to provide information and technical comments throughout the PEIS and RMP amendment processes.

The state of Idaho appreciates the opportunity to submit these comments. Please feel free to contact me should you have any questions or need clarification.

Sincerely,

Richard Stover
Administrator
Office of Energy and Mineral Resources

Feedback Letter From: Cassia County Noxious Weed Control

Cassia County Noxious Weed Control
1459 Overland Ave., Rm 4
Burley, ID 83318
Phone: 208-878-4043
Fax: 208-878-7862
Email: mottley@uidaho.edu

BLM Renewable Energy Strategy

We are concerned with the impact of future renewable energy project will have on the introduction and establishment of noxious and invasive weeds. This will create a lot of disturbed ground which is an ideal environment for the introduction and establishment of noxious and invasive weeds.

We think that these future project needs a detailed plan of action for noxious and invasive weed control so noxious and invasive weeds do not become established in the area. The plan should include the actions below.

The most important part of the plan needs to be prevention. This involves making sure all vehicles and construction equipment are clean when they arrive at the site. Washing and removing all dirt and debris that may contain weed seeds should be done at their previous construction site. This is like what firefighting crews do before moving to a new fire.

The second part of the plan should be revegetation of disturbed constriction sites and roadsides with desirable grasses so there is no bare ground for noxious and invasive weeds to get a foothold to become established.

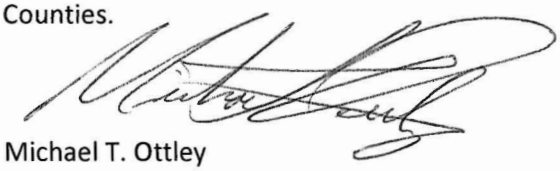
Monitoring the whole area must be done to detect noxious and invasive weeds as early as possible and before they become established in large areas. Monitoring must be done throughout the growing season to find new plants in the area so they can be controlled before they become established.

Control measures like mechanical control, or herbicides, need to be done on a regular, timely basis to prevent noxious and invasive weeds from going to seed and spreading throughout the project.

Failure to implement any of these will most likely result in the establishment and spread of noxious and invasive weeds throughout the project. The weeds will also spread to neighboring areas of the project, and neighboring Counties. Once noxious and invasive weeds become established it is harder to get them under control and will cost a lot more money to control them.

We would also like to see the Noxious Weed Superintendents from the Counties near the project involved in making and implementing the weed control plan. These are local people with the knowledge of what weeds to be on the lookout for, and the best way to prevent noxious and invasive weeds from becoming established in the project area.

We understand that green energy projects are going to happen as we move to using more renewable energy. But areas where these projects are built MUST be protected from noxious and invasive weeds, and MUST have a complete plan for the prevention, monitoring, and control of the noxious and invasive weeds that could become established in the project area, and then move to surrounding areas and Counties.



Michael T. Ottley

Cassia County Noxious Weed & Invasive Species Superintendent

Feedback Letter From: The Idaho Association of Noxious Weed Control Superintendents

The Idaho Association of NOXIOUS WEED CONTROL SUPERINTENDENTS

Chair:	Vice Chair:	Secretary:	Treasurer:
Mitch Whitmill	**Michael Ottley**	**Chase Youngdahl**	**Alan Martinson**
Jefferson County	Cassia County	Bonner County	Latah County
PO Box 268	1549 Overland Ave #4	1500 Hwy 2, Ste. 101	200 S. Almon #105
Roberts, ID 83444	Burley, ID 83318	Sandpoint, ID 83864	Moscow, ID 83843
208-745-9221	208-878-4043	208-255-5681ext.6	208-883-7210

The Idaho Association of Noxious Weed Control Superintendents (IANWCS) is an organization that is made up of Weed Superintendents from every County in the State of Idaho. We are concerned with the impact that future renewable projects will have on the introduction and establishment of noxious and invasive weeds. We understand that future projects could create a lot of disturbed ground which is an ideal environment for the introduction and establishment of noxious and invasive weeds.

Future projects need a detailed plan of action for noxious and invasive weed control. So noxious and invasive weeds do not become established in the area. The plan should include the actions below.

- The most important part of the plan needs to be prevention. This involves making sure all vehicles and construction equipment are clean when they arrive at the site. Washing and removing all dirt and debris that may contain weed seeds should be done at their previous construction site. This is similar to what firefighting crews do before moving to a new fire.
- The second part of the plan should be revegetation of disturbed constriction sites and roadsides with desirable grasses so there is no bare ground for noxious and invasive weeds to get a foothold to become established.
- Monitoring the whole area must be done to detect noxious and invasive weeds as early as possible and before they become established in large areas. Monitoring must be done throughout the growing season to find new plants in the area so they can be controlled before they become established.
- Control measures like mechanical control, or herbicides, need to be done on a regular, timely basis to prevent noxious and invasive weeds from going to seed and spreading throughout the project.

Failure to implement any of these will most likely result in the establishment and spread of noxious and invasive weeds throughout the project. The weeds will also spread to neighboring areas of the project, and neighboring Counties. Once noxious and invasive weeds become established it is harder to get them under control and will cost a lot more money to control them.

We would also like to see the Noxious Weed Superintendents from the Counties near the project involved in making and implementing the weed control plan. These are local people with the knowledge of what weeds to be on the lookout for, and the best way to prevent noxious and invasive weeds from becoming established in the project area.

We understand that green energy projects are going to happen as we move to using more renewable energy. But areas where these projects are built MUST be protected from noxious and invasive weeds, and MUST have a complete plan for the prevention, monitoring, and control of the noxious and invasive weeds that could become established in the project area, and then move to surrounding areas and Counties.

X _____
Mitch Whitmill
IANWCS Chair

X _____
Mike Ottley
IANWCS Vice Chair