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March 18, 2021

Honorable Debra Haaland,
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Haaland:

Geothermal Rising (formerly the Geothermal Resources Council) supports the initial actions taken by the Biden Administration to combat climate change with great enthusiasm. We are a non-profit organization dedicated to bolstering the role of geothermal energy—a hugely versatile renewable energy resource that can sustainably generate both heat and power—domestically and abroad. We applaud the President’s commitment to elevating the urgency of climate policy.

To help facilitate the development of 25 GW of renewable energy on public lands by 2025, this letter provides recommendations related to the geothermal permitting process. Today, permitting is one of the largest barriers to building new geothermal energy. The process of analyzing and seeking multiple approvals required by the National Environmental Policy Act of 1969 (NEPA) to develop on federal lands can take up to four years and is lengthier and more prone to delay for geothermal than for other renewables like solar and wind or for oil and gas industry projects.

We believe that renewable energy development on public lands should incorporate careful consideration of environmental impacts. However, the current permitting process is replete with repetitive, duplicative assessments and prolonged processing, making it difficult for developers to plan, finance, and build projects effectively. To improve NEPA efficiencies and foster significant growth in geothermal energy development on public lands, we recommend the following measures:

- Expanding the application of Casual Use Reviews, Determinations of NEPA Adequacy, and Categorical Exclusions in place of full Environmental Assessments (EAs) and Environmental Impact Statements (EISs);
- Increasing the transparency of permit tracking and agency delays;
- Implementing programmatic EAs and EISs to streamline the NEPA process; and,
- Allowing the combination of environmental analyses for multiple phases of geothermal development (i.e. exploration and development phases of a single project).

Geothermal Rising supports these measures and urges the Administration to consider them as effective steps towards increasing efficiency and helping to unlock the long-term potential of geothermal energy,



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a promising reliable, resilient, renewable resource. We would be happy to discuss these suggestions in more detail at any point.

Sincerely,

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