



GEOTHERMAL RISING POLICY

ENERGIZING OUR RENEWABLE FUTURE.

November 19, 2024

The Honorable Deb Haaland
Secretary
Department of the Interior
1849 C Street NW
Washington, D.C. 20240

RE: Geothermal Rising's Comments on the BLM's Proposed Categorical Exclusion for Geothermal Resource Confirmation

Dear Secretary Haaland:

As the largest and longest running trade association of the geothermal industry in the United States, representing over 100 geothermal organizations, *Geothermal Rising* writes to express support of the administrative proposal to add a new Categorical Exclusion (CX) for geothermal resource confirmation activities on Federal geothermal resource leases. We commend the DOI, and the BLM for recognizing this critical need to grant CXs for geothermal exploration and resource confirmation, an effort that has been 20 years in the making to mitigate some of the unnecessary permitting barriers in the way of the development of clean, stable, baseload geothermal energy.

Regarding the potential of geothermal energy in America, the Department of Energy's 2019 [GeoVision report](#) anticipated that geothermal energy could provide 60 GW of 24/7 clean, firm electricity by 2050 and their 2024 [Next-Generation Geothermal Power Commercial Liftoff report](#) later projected up to 90 GW. These reports highlighted the "unique value proposition" of geothermal energy, including minimal supply chain or workforce risk, low land use, and flexible generating capability. By shifting its generation to times when power is most valuable, geothermal energy can serve as a clean, baseload, renewable, and reliable resource, which will also free up American oil and gas for export revenue.

The demand for clean baseload power, which geothermal energy can provide, is already high and expected to continue rising sharply, as discussed in the May 21, 2024, Senate Committee on Energy and Natural Resources hearing "[to Examine the Opportunities, Risks, and Challenges Associated with Growth in Demand for Electric Power in the United States.](#)" Policy reforms will enable the private and public sectors to partner and meet America's growing energy demand by developing its vast geothermal potential, ensuring an ample supply of reliable environmentally friendly electricity and heat for generations to come.

We emphasize the bi-partisan appeal of geothermal energy, and that its unique ability to support environmental stewardship, sustainable development, and energy security is of great benefit to constituents of various backgrounds and ideologies. We respectfully urge continued reasonable policy reforms to unleash America's geothermal energy potential to serve these shared energy and environmental interests— which are fundamentally *American* interests. With these reforms, the geothermal energy industry has the potential to expand the current geothermal workforce of 8,000 to 240,000 at scale.¹

Leasing and permitting improvements are essential to scaling geothermal energy. Projects located in the Western U.S. are likely to occur on federal lands, which can trigger federal environmental reviews under the National Environmental Policy Act (NEPA), up to 6 distinct times from leasing to operation.

¹ [Next-Generation Geothermal Power Commercial Liftoff report](#)



GEOTHERMAL RISING POLICY

ENERGIZING OUR RENEWABLE FUTURE.

The proposed CX would significantly reduce permitting timelines and capital costs of geothermal resource confirmation operations plan of up to 20 acres, by allowing both phases of exploration to be addressed in a single environmental review. Streamlining the resource confirmation timeline will de-risk initial investment and would attract more private capital to support geothermal deployment.

The proposed CX offers a balanced approach to incentivize responsible land use. BLM appropriately emphasizes the one-time nature of covered activities, where leaseholders need only characterize the geothermal resource once, minimizing future disruptions. Additionally, BLM highlights required reclamation after project completion, mitigating long term or cumulative impacts. BLM has issued Finding of No Significant Impacts (FONSI) following an environmental assessment for projects that exceed the proposed 20-acre CX cap. The Substantiation Report shows that 100% of sampled projects resulted in a FONSI including projects that had a total surface disturbance of more than 20 acres. Given these facts, Geothermal Rising would also be supportive of an expanded CX acreage cap given the detailed analysis of past activities studied by BLM that all resulted in a FONSI.

In addition to the beneficial implications for industry and Americans, the proposed CX will also benefit the Agency, as the proposed rule lays out, Categorical Exclusions increase Agency efficiency by reducing the resources spent analyzing proposals that do not present significant environmental impacts, thereby allowing those resources to be focused on more environmentally significant proposals. Given the likely increase in geothermal drilling activities, reallocating staff time to focus on higher-impact proposals would proactively reduce project delays, potentially addressing permit approval timeline disparities across the various field offices.

Geothermal Rising believes that geothermal energy development should be done responsibly and with careful consideration of environmental impacts and we believe that the proposed CX for geothermal resource confirmation is aligned with these values. Further the CX is an important step to avoid unnecessary review and enable faster deployment of this critical renewable energy resource.

Again, we commend the work that went into this proposal— it is reasonable and warranted, and we urge its adoption as soon as possible.

Please let us know if you have any questions.

Sincerely,

Bryant Jones, Ph.D.
Executive Director
Geothermal Rising
www.geothermal.org