



GEOTHERMAL RISING POLICY

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U.S. Department of the Interior
Office of the Solicitor
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RE: Comments in Response to Request for Information on DOI Regulatory Reform

Geothermal Rising writes in response to this request for information (RFI) and expresses strong support for the President's directives to reduce regulatory burdens and advance American energy independence. We commend the Department of the Interior (DOI) for seeking public input to identify regulations that can be modified or repealed to unleash our nation's domestic energy resources.

Geothermal energy is key to President Trump's agenda for comprehensive energy dominance and security. It offers high-capacity (90%+) power essential for grid reliability and artificial intelligence load growth, leverages the skills of the U.S. oil and gas sector, and can create thousands of domestic jobs while building out American supply chains. The U.S. currently leads the world in next-generation geothermal innovations, yet to maintain this competitive momentum and unleash the full potential of geothermal power within our own borders, strategic regulatory reform is paramount.

Our industry has identified several areas where existing regulations hinder American geothermal deployment. We offer the following solutions, as related to the questions posed in the RFI.

1. Reforming Geothermal Leasing to Spur Exploration (as related to RFI Questions #3, #5, and #7)

- **Transitioning to annual competitive lease sales**, as supported by recent congressional efforts, improves predictability **and offers a path for more regular access to geothermal prospects**, but it does not address the fundamental issue of access to frontier lands. To be effective, this transition must be paired with **clear direction on lease nomination timelines, sale schedules, and acreage availability**, as well as **regular updates from the Bureau of Land Management (BLM) on the status of nominated lands** to ensure industry can plan and allocate resources accordingly.
- The lack of certainty around which nominated lands will be included in lease sales increases investment risk and deters developers from pursuing exploration on federal lands.
- **To improve transparency and predictability**, DOI should issue a rule requiring BLM to offer **at least 50%** of the total acreage nominated by industry and approved for development in each year's competitive lease sale.
- This threshold would ensure industry interest more directly determines lease sale content, providing the consistency needed for companies to plan and invest in long-lead geothermal projects.



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- To safeguard against land speculation, lease awards should be coupled with **clear work requirements or development milestones**, as is common in the mining sector.

2. Expediting Environmental Review and Permitting to Reduce Risk and Delay (as related to RFI Questions #2, #5, #7, and #9)

A massive obstacle to deploying American geothermal power is a slow, duplicative, and uncertain permitting process that is fundamentally at odds with the national energy dominance agenda. A single geothermal project can face a permitting timeline of up to a decade, with project components triggering up to seven separate and sequential *National Environmental Policy Act* (NEPA) reviews.

- We recommend that DOI grant geothermal the same Categorical Exclusions (CEs) for low-impact activities that are already available to the oil and gas industry, consistent with the bipartisan [STEAM Act](#). Specifically, DOI can administratively update the existing CE for “geothermal resource confirmation operations plans of up to 20 acres” by: (1) extending its application to include broader exploration and development activities, and (2) expanding the exempted area beyond 20 acres while also excluding linear features like access roads from the acreage cap.
- For projects that do not fall within a CE but are shown through initial desktop review to have no significant habitat or cultural impacts, DOI should establish a new NEPA review fast-tracking process to accelerate their approval.
- Establish firm decision deadlines for permit applications (e.g., a 60-day final decision deadline, as proposed in the [GEO Act](#)).
- To prevent moving goalposts, establish a rule that limits the applicability of newly-designated critical habitat or cultural resource areas for any permit application already in progress. Once an application is deemed complete, its review should proceed based on the designations in place at the time of submission.
- To encourage redevelopment of existing sites, clarify or create a regulation that limits an operator’s liability for any environmental issues caused exclusively by a prior operator on a given lease.
- Create a rule, consistent with the principles of the bipartisan [HEATS Act](#), that waives the requirement for a duplicative federal drilling permit on split-estate lands when a sufficient state permit has already been issued. Currently, even on private land where the federal government owns a minority of the subsurface rights, developers must get permits from both state and federal authorities. This rule would waive the redundant federal review and defer to capable state-level regulation.

3. Bolstering Agency Capacity to Implement the President's Agenda (In response to RFI Questions #6, #8, and #9)



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The Administration's directives to unleash American energy and expedite permitting are encouraging steps. However, this vision cannot be replicated at scale if the BLM lacks the capacity and standardized processes to execute it.

- Potential solutions include granting the BLM cost-recovery authority for geothermal permit processing, similar to the [Geothermal Cost-Recovery Authority Act of 2025](#) to provide the agency with a funding stream from applicants to hire and train specialized staff.
- Establish a National Geothermal Permitting Center or a Geothermal Ombudsman within the BLM to centralize expertise, create standard operating procedures, and ensure consistency across field offices.
- Enhance modernized electronic permitting systems (as related to the [Electronic Permitting Modernization Act](#)) to include a transparent, real-time public portal for tracking application status.

Conclusion

The path to true American energy dominance runs directly through the heat beneath our feet. The geothermal industry is ready to develop, deploy, and deliver the secure, reliable, 24/7 power our nation needs, but it depends on the leadership of our federal government and agencies – as was the case to unleash America's shale revolution. The reforms we have proposed will clear regulatory hurdles that currently stifle American innovation. We urge the Department to continue its work engaging with stakeholders to adopt pragmatic solutions for our shared goal of unleashing the full potential of baseload and largely untapped domestic energy resources.

Sincerely,

Bryant Jones, PhD
Executive Director
Geothermal Rising