

March 13, 2023

Jennifer Granholm
Secretary of Energy
U.S. Department of Energy
1000 Independence Ave., S.W.
Washington, DC 20585

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

Dear Secretaries Granholm and Haaland:

The undersigned hunting, fishing, conservation, professional society, and landowner organizations write in support of the Biden Administration's efforts to deploy renewable energy development to respond to the climate crisis, and also to stem the loss of biodiversity. Our organizations have significant experience conserving land, waters and wildlife and offer our support and expertise at this critical moment in time.

As you well know, President Biden has set ambitious goals for expanding renewable energy develop in order to respond to the climate crisis, including specific direction to the Secretary of the Interior to increase renewable energy on public lands and waters.¹ Similarly, Congress has instructed the Secretary of the Interior to "seek to issue permits" for wind, solar, and geothermal energy projects on public lands that produce at least 25 gigawatts of electricity by 2025.²

One such recent development in this regard is the announcement by the Bureau of Land Management to revisit and possibly expand the agency's existing plans and processes related to solar development on public lands. Solar energy development has the potential to expand five-fold by 2030. By 2050, it is anticipated that ground-mounted solar is likely to encompass millions of acres of land - as much as 0.5% of the surface area of the contiguous U.S.³ Our organizations believe that solar energy is an essential part of the climate solution. Yet we know the United States, and the globe, also face a biodiversity crisis - as President Biden also highlighted in 2021.⁴ So long as solar energy development is well-planned and appropriately sited, it will go a long way to ensuring the Administration's climate and biodiversity goals can be met.

In 2012, the U.S. Fish and Wildlife Service released federal Wind Energy Guidelines that were developed with broad input from state wildlife agencies, conservation and sporting organizations, the wind industry, and others. In the last decade, we have seen that having standards and a mitigation framework in place for developers to evaluate potential adverse impacts to fish, wildlife, and habitat has proven to be essential. Critically, the guidelines also set expectations for early consultation with state and federal fish and wildlife agencies to ensure that potential projects are being planned and designed with the input of the nation's wildlife professionals.

¹ Tackling the Climate Crisis at Home and Abroad, Executive Order 14,008, 86 Fed. Reg. 7619, 7624 (Feb. 1, 2021).

² 43 U.S.C. § 3004(b).

³ U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy. [Solar Futures Study](#) (September 2021).

⁴ Tackling the Climate Crisis at Home and Abroad, Executive Order 14,008, 86 Fed. Reg. 7619, 7624 (Feb. 1, 2021).

With the accelerating scale and pace of solar energy development noted above, we believe now is the time for the U.S. Department of Energy (DOE) and U.S. Fish and Wildlife Service (FWS) to partner in the development of solar energy guidelines, modeled on the federal Wind Energy Guidelines. DOE or FWS are appropriate entities to lead in the development of these guidelines given their expertise and purviews. Our organizations support a transparent process that engages a broad group of stakeholders, similar to the process to develop the federal Wind Energy Guidelines, which led to broad buy in and support for, and utilization of, the recommendations.

As your agencies advance this important work to ensure renewable energy is deployed to reduce the impacts of climate change, while also maintaining and conserving critical biodiversity, we offer our assistance as key experts and partners. If you have any questions you may contact Jessica Wilkinson, The Nature Conservancy (jwilkinson@tnc.org), or Madeleine West, Theodore Roosevelt Conservation Partnership (mwest@trcp.org).

Sincerely,

Fly Fishers International

Land Trust Alliance

National Deer Association

North American Grouse Partnership

The Conservation Fund

The Nature Conservancy

The Wildlife Society

Theodore Roosevelt Conservation Partnership

Trout Unlimited

Cc:

Alejandro Moreno, Acting Assistant Secretary for Energy Efficiency and Renewable Energy, U.S. Department of Energy

Michele Boyd, Strategic Analysis and Institutional Support Program Manager, U.S. Department of Energy

Shannon Estenoz, Assistant Secretary for Fish and Wildlife, Department of the Interior

Martha Williams, Director, U.S. Fish and Wildlife Service