







The Role of Environmental Review in the Development of Renewable Energy

Introduction

Meaningful renewable energy development is vital to enhance our energy security and helps us shift away from climate-damaging fossil fuels. The benefits of large-scale renewable energy development, however, come with potentially significant impacts for our public lands, water, wildlife, and wilderness values. The National Environmental Policy Act (NEPA) allows federal agencies, stakeholders, and the public to properly assess proposed projects and to weigh in on these decisions in order to achieve optimal results that both protect natural and cultural resources and move the national toward a clean energy future. To ensure that NEPA reviews are carried out in an adequate, efficient and timely manner, standards for all NEPA analyses of renewable energy projects should be developed to address key issues that have been identified during the reviews that have been undertaken to date.

Standards

Standards that should be implemented for strong siting decisions should include:

- Consistent structure of environmental documents.
- Opportunities for meaningful public engagement early in the public process before investments are committed to a particular resource.
- Clear parameters of an adequate statement of purpose and need.
- A reasonable range of alternatives that are analyzed, including the proposed alternative, no action alternative, and at least two additional alternatives that utilize different technology and/or are smaller in size than the proposed action. An alternatives analysis should also consider alternate locations beyond the specific boundaries of proposed rights-of-way, including appropriate private land alternatives.
- A robust, quantitative, cumulative impact analysis to ensure sufficient review of all likely connected actions (such as transmission associated with a proposed project) and additional projects of all kinds within the planning area or sensitive habitat.
- A uniform set of baseline terms and conditions to be incorporated into use authorizations, e.g., leases, so that the agency employs a consistent approach across all renewable energy technology types to ensure the protection of the natural and cultural resources of public lands. The terms and conditions should protect the agency's ability to impose additional protective measures based on any new information obtained post-lease including newly discovered listed species or monitoring information as well as to preserve the agency's prerogative to apply new policies and new program requirements, such as diligence requirements, zoning/prioritization decisions, best management practices and bonding requirements to use authorizations that have already been issued.

NEPA is a roadmap—not a roadblock—to ensuring that renewable energy development on public lands is carried out in a transparent, responsible manner.