



August 20, 2018

Submitted via Federal eRulemaking Portal
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Edward A. Boling
Associate Director for the National Environmental Policy Act
Council on Environmental Quality
730 Jackson Place NW
Washington D.C. 20504

RE: Comments by the American Council on Renewable Energy on Docket No. CEQ-2018-0001 Update to the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act

Dear Mr. Boling:

The American Council on Renewable Energy (ACORE) is pleased to submit the following comments on the Administration's efforts to improve the National Environmental Policy Act (NEPA) process. We believe the NEPA process can be made more efficient, promoting additional investment and development of renewable energy generation infrastructure, while ensuring continued protection of the environment.

ACORE is a pan-renewable energy organization representing the nation's leading renewable energy developers, manufacturers, financial institutions, corporate end-users, utilities, providers of smart grid technology and the many other diverse industries that make up the thriving renewable energy economy. We are dedicated to advancing the renewable energy sector through market development, policy changes and financial innovation.

Renewable power generation has been the largest source of private sector infrastructure investment in the U.S. in each of the past seven years. From 2008 to present, renewables have been the largest source of new power generation capacity in the U.S., outcompeting all other sources of electricity, delivering lower cost power to consumers and tangible economic benefits throughout the country. In 2017 alone, the U.S. renewable energy sector saw more than \$40 billion in private sector investment, helping to support 18.4 gigawatts of new power generation on the grid. Renewable electricity is a powerful economic driver employing 544,000 American workers last year, according to the Energy Futures Initiative.

Efforts to promote more investment and development in U.S. renewable energy generation and other infrastructure are important to economic growth, electric grid modernization and a continued reliable supply of affordable, domestically produced electricity for American consumers.

Our nation's federal lands contain vast quantities of untapped, high-potential renewable resources. However, renewable energy leases on Bureau of Land Management lands constitute less than one percent of the total acreage leased for energy exploration and production. Improvements in the NEPA process and other measures to promote development on suitable federal lands can deliver even greater economic and energy benefits to the nation.

The development of renewable energy generation facilities, on public and private lands, is frequently subject to federal approval and therefore requires compliance with NEPA. For example, in the siting and permitting phase, individual utility-scale renewable energy projects on private lands, based on their location, may trigger review and planning processes under the Endangered Species Act (ESA) that would be subject to NEPA compliance. Delays caused by the protracted NEPA process in issuing Incidental Take Permits under the ESA can slow or halt the development of renewable projects or force completed projects to operate at a fraction of total capacity to remain in compliance, thereby reducing the overall contribution of renewable energy into the nation's electrical grid. Larger-scale land management planning, such as the creation of the Desert Renewable Energy Conservation Plan, also triggers NEPA review and delays that can be costly for numerous potential projects.

Whether it be the installation of an individual generation facility or broader regional planning, improving efficiencies in the NEPA process can have a significant impact on renewable energy and infrastructure investments nationally. Renewable energy development and modernization of the electrical grid are capital-intensive projects that operate in competitive marketplaces. A lack of certainty and lengthy periods or delays in the NEPA process can greatly increase overall costs and can even prevent viable projects from reaching fruition, which stalls market progress. Improvements in process efficiency can reduce project costs and uncertainty, and can therefore encourage private development in a cleaner, more advanced and more reliable power grid system.

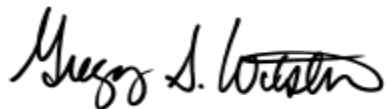
ACORE believes that efforts to improve the NEPA process while maintaining adequate environmental oversight for federal decision-making will be critically important to deploying renewables and updating our aging infrastructure. We welcome the opportunity to work with the Council on Environmental Quality (CEQ) to identify responsible ways to improve the NEPA process. In particular, we respectfully urge CEQ to pursue the following objectives:

- Ensure that multi-agency environmental reviews and authorizations are performed in a manner that is concurrent, synchronized, timely and efficient, and use optimal interagency coordination;
- Better facilitate agency use of environmental studies, analysis, and decisions in prior federal, state, tribal or local NEPA actions;
- Ensure that NEPA actions are performed in a timely manner and such timelines are enforced in a way that provides an adequate level of certainty for renewable energy investors and developers; and
- Improve predictability and transparency in NEPA reviews and authorizations.

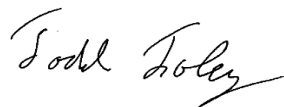
Additionally, we would welcome the opportunity to work with the Administration on efforts to improve other related federal processes, such as the Desert Renewable Energy Conservation Plan, to promote more investment and development in renewable energy generation and transmission infrastructure on federal lands containing untapped, high-potential renewable resources. Responsible development of these federal lands while protecting the environment will yield even more economic and energy security benefits for the nation.

We respectfully submit these comments and welcome the opportunity to work with CEQ and other relevant entities to promote further U.S. economic investment, energy security and the protection of our nation's environment.

Sincerely,



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President & Chief Executive Officer
ACORE



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Senior Vice President of Policy &
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