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February 17, 2025

U.S. Department of the Interior  
Bureau of Land Management  
Attention: BLM HQ330 Geothermal Exploration Operations Categorical Exclusion  
1849 C Street NW,  
Washington, DC 20240

**RE: Geothermal Rising’s Comments on the BLM’s Proposed Categorical Exclusion for Geothermal Resource Exploration**

Dear Secretary Burgum:

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 exploration activities on Federal geothermal resource leases. We commend the DOI, and the BLM for recognizing this critical need to grant CXs for geothermal exploration, 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.

The Department of Energy’s 2024 [Next-Generation Geothermal Power Commercial Liftoff report](#) anticipated that geothermal energy could provide 90 GW of 24/7 clean, firm electricity by 2050, highlighting 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](#).” Permitting reforms will enable the private and public sectors to partner and meet America’s growing energy demand by developing its vast geothermal potential. Further, geothermal energy is poised to support the Administration’s America-first agenda to ensure our energy security, independence, and leadership, as outlined in [Executive Order: Declaring a National Energy Emergency](#) and [Executive Order: Unleashing American Energy](#).

**Streamlined leasing and permitting processes are essential to scaling geothermal energy in a timely manner. For this reason, we are supportive of the DOI’s proposal<sup>1</sup> to revise the National Environmental Policy Act (NEPA) implementing procedures for the Bureau of Land Management (BLM) at chapter 11 of part 516 of the Departmental Manual (DM) to add a new categorical exclusion (CX) for geothermal resource exploration operations.**

The proposed CX is backed by extensive analysis of past exploration activities, with findings confirming that these operations do not result in significant environmental effects. With freed-up resources from fewer Environmental Assessments (EAs) or Environmental Impact Statements (EISs) as a result of the CX, the BLM can allocate its resources more efficiently and with enhanced focus

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<sup>1</sup><https://www.federalregister.gov/documents/2025/01/17/2025-01084/national-environmental-policy-act-implementing-procedures-for-the-bureau-of-land-management-516-dm>



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on reviews that matter most, allowing routine, well-understood exploration activities to proceed unhindered.

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 exploration strikes this balance.

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](http://www.geothermal.org)