

April 18, 2024

Tracy Stone-Manning, Director
Bureau of Land Management
1849 C St. NW
Washington, DC

Dear Director Stone-Manning:

The undersigned hunting, wildlife conservation, and professional societies write in regard to the Bureau of Land Management's draft programmatic environmental impact statement (draft PEIS) for utility-scale solar energy development across 11 western states, referred to as the Western Solar Plan. We express concern about potential conflicts with crucial big game habitats in the preferred alternative of the draft PEIS and request that modifications be made to the final plan.

The BLM manages 245 million acres of federal public lands, which provide vital habitats for numerous fish and wildlife species and support hunting, fishing, recreational shooting, and other outdoor recreation opportunities for millions of Americans. These lands are managed for multiple-use and sustained yield, including wildlife habitat and energy development. Many of the agency's existing resource management plans are outdated, underscoring the need to update BLM-administered plans.

While we recognize the necessity of updating BLM land use plans, this process should aim to minimize conflicts with other resource values to facilitate the deployment of solar energy in suitable locations. Unfortunately, as proposed, the Solar PEIS creates conflict with crucial habitats for mule deer, pronghorn, elk, and bighorn sheep. Revered big game populations such as the Kaibab mule deer herd in Arizona, the Muddy Mountains desert bighorn sheep herd in Nevada, and the Wyoming Range mule deer herd could face severe impacts from the proposal. Further, the BLM must weigh the benefits of generating carbon neutral electricity against eliminating carbon sequestering habitats.

In the draft PEIS, the preferred alternative (Alt. 3) would allocate 22 million acres for utility-scale solar development across 11 western states. According to the BLM, 4 million of these available acres encompass big game winter range, and 1.8 million available acres are identified as migration corridors.

Solar facilities are mandated to be high-fenced (7 ft) by the National Electric Safety Code to prevent unauthorized access by people. The perimeter fences around individual solar facilities can span 5,000 acres or more, posing a complete barrier to public access and big game movements. Unfortunately, little research has been conducted on the immediate or cumulative impacts of solar development on movement of ungulates. A study in Wyoming focused on the impact of a solar development on a pronghorn herd and the results showed dire consequences.ⁱ

Once severed, the loss of big game habitats may be irreversible, and the design features outlined in the draft PEIS are unlikely to adequately mitigate impacts. Given the paucity of knowledge, we urge the BLM to be judicious in the expansion of solar development as the necessary investments in research are made to at least minimally help guide informed siting. We additionally encourage the BLM to work with State Fish and Wildlife Agencies in determining critical habitat and migration corridors for development exclusion.

The draft PEIS concludes that 700,000 BLM acres are necessary to fully achieve the agency's solar deployment objectives. These deployment objectives would be better achieved by fully subscribing existing infrastructure with solar energy generation (e.g., rooftops, parking lots) outside of BLM's jurisdiction, though there are many suitable sites on BLM lands. Even if acreage needs exceed expectations, the BLM could exclude the 5.8 million acres of winter range and migration corridors from availability and still accomplish its utility-scale solar development objectives. To mitigate conflicts and uphold our western wildlife populations and outdoor traditions, we urge the BLM to exclude these habitats in the final Western Solar Plan.

Thank you for considering our request.

Sincerely,

Association of Fish and Wildlife Agencies
Backcountry Hunters & Anglers
Boone and Crockett Club
Camp Fire Club of America
Congressional Sportsmen's Foundation
Conservation Force
Delta Waterfowl
Houston Safari Club
Izaak Walton League of America
Masters of Foxhounds Association
National Wild Turkey Federation
National Wildlife Federation
North American Falconers Association
North American Grouse Partnership
Orion: The Hunter's Institute
Pope & Young Club
Professional Outfitters and Guides of America
Public Lands Foundation
Rocky Mountain Elk Foundation
Safari Club International
Sportsmen's Alliance
The Wildlife Society
Theodore Roosevelt Conservation Partnership
Whitetails Unlimited
Wild Sheep Foundation
Wildlife Forever
Wildlife Management Institute

ⁱ Sawyer, H., Korfanta, N. M., Kauffman, M. J., Robb, B. S., Telander, A. C., & Mattson, T. (Year). Trade-offs between utility-scale solar development and ungulates on western rangelands. *Frontiers in Ecology and the Environment*, Volume(Issue), Pages. DOI: <https://doi.org/10.1002/fee.2498>