

Hunting and Wildlife Conservation Council

June 5, 2024

The Honorable Deb Holland
Secretary
Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Haaland:

The Hunting and Wildlife Conservation Council (Council) writes regarding the Bureau of Land Management's proposal for utility-scale solar energy development across 11 western states, referred to as the Western Solar Plan. Specifically, the Council is concerned about potential conflicts that may arise with crucial big game winter range and seasonal migrations in the agency's preferred alternative. We respectfully request that modifications be made to the final plan to avoid these conflicts.

Federal public lands managed by the BLM serve as vital habitats for numerous fish and wildlife species, and landscapes that support activities such as hunting, fishing, recreational shooting, and various outdoor recreational pursuits for millions of Americans. These lands are managed for multiple-use and sustained yield, including wildlife habitat and energy development.

While the Council appreciates the necessity of periodically updating BLM land use plans, we feel it is important that this process seeks to minimize conflict with other resource values when seeking to facilitate solar deployment in suitable locations. We are concerned that as currently proposed, the Solar Draft Programmatic Environmental Impact Statement (PEIS) could inadvertently direct development toward crucial habitats for mule deer, pronghorn, elk, and bighorn sheep, including herds that have been researched and mapped by states in cooperation with DOI through implementation of Secretarial Order 3362. Revered big game populations such as the Kaibab mule deer herd in Arizona, the Muddy Mountains desert bighorn sheep herd in Nevada, and the Pioneer Reservoir mule deer herd in Idaho could suffer from the proposed plan.

In the draft PEIS, the preferred alternative (Alternative 3) would allocate 22 million acres for utility-scale solar development across the 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 big game migrations.

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It is important to note that solar facilities are mandated to be high fenced (7 ft) by the National Electric Safety Code to prevent unauthorized access by humans. 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, limited research has been conducted on the immediate or cumulative impacts of solar development on ungulate movements. A study in Wyoming focused on the impact of a solar development on a pronghorn herd and the results showed significant consequences.¹

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 scarcity of knowledge, the Council urges the BLM to exercise caution in expanding solar development until the necessary investments in research are made to inform site selection decisions. Furthermore, we encourage the BLM to work with state and tribal fish and wildlife agencies in determining crucial habitats 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. However, these objectives could be better achieved by fully utilizing existing infrastructure with solar energy generation (e.g., rooftops, parking lots) outside of BLM's jurisdiction, although suitable sites on BLM lands do exist. 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, the Council strongly urges the BLM to exclude from availability these big game habitats as well as greater sage grouse priority habitat management areas in the final Western Solar Plan. Thank you for your consideration of this matter. If you have any questions or need more information, please contact Council Designated Federal Officer Doug Hobbs at doug_hobbs@fws.gov, or on (703) 358-2336.

Sincerely,



John Devney
Chair

¹ 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>

Cc: HWCC members
Steve Feldgus, Principal Deputy Assistant Secretary - Land and Minerals Management,
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Tracey Stone-Manning, Director – Bureau of Land Management