

*Wildlife and Hunting Heritage
Conservation Council*

March 12, 2012

The Honorable Ken Salazar, Secretary
Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Re: BLM Solar Programmatic Impact Statement

Dear Secretary Salazar:

We write to convey our strong support for establishing consistent and predictable rules for developing viable renewable energy on our public lands and the development of the Solar PEIS on Bureau of Land Management (BLM) lands. As you know, developing solar energy on our Western public lands means providing enough land that has high solar energy production potential with the least amount of conflicts with other multiple-use resources and values. To us, that means locating domestic solar energy production facilities in the right places near existing or already proposed transmission lines, and working with all stakeholders beforehand to prevent any unnecessary delays. Diligent planning efforts can help to protect the West's cherished places where families have hunted, fished, hiked, and otherwise used the public lands for generations.

We appreciate the effort put into BLM's revised proposal for siting new large-scale solar projects on public lands in six Western states. It clearly reflects the significant input received from hunters and anglers, industry, community leaders, and conservationists across the West. With some additional work, we believe the proposed framework will serve as an effective, strategic roadmap to developing the Southwest's most appropriate solar resources and kick-start effective solar energy production.

In the final version of its approved solar program, the Department of the Interior must provide hunters and anglers, other outdoor recreationists, the solar industry, utilities, investors, conservationists, and other stakeholders with the certainty needed to develop projects efficiently and effectively. Prioritizing development in low-conflict, high solar resource zones, will offer greater certainty that project proposals will not interfere with access to public lands for hunting and fishing and other outdoor recreation; and developers will benefit from greater certainty that they can more easily deliver generated electricity and associated jobs to consumers. Any process to approve development outside those zones must demonstrate minimal conflict with wildlife, access, and other values through public input and provide opportunities for local input into the process. And a final program must ensure unavoidable impacts are fully offset through mitigation and other conservation investments based on value-for-value accounting.

Important elements that should be included in the revised draft framework that would strike a better balance between the pathway to development and conservation of wildlife habitats and hunting and fishing opportunities include:

CHAIRMAN

John Tomke
Ducks Unlimited

VICE CHAIRMAN

Christine Thomas
University of Wisconsin-Stevens Point

MEMBERS

M. David Allen
Rocky Mountain Elk Foundation

Jeffrey S. Crane
Congressional Sportsmen's Foundation

Robert R. Fithian
Alaska Professional Hunters
Association, Inc.

John E. Frampton
South Carolina Department of Natural
Resources

Thomas Franklin
Theodore Roosevelt Conservation
Partnership

Ron Heward
Heward 7E Ranch

Robert Manes
The Nature Conservancy

Baasewe Frederick D. Maulson
Great Lakes Indian Fish and Wildlife
Commission

Tommy Millner
Cabela's

Robert Model
Boone and Crockett Club

Joanna Prukop

Stephen L. Sanetti
National Shooting Sports Foundation

Larry Schweiger
National Wildlife Federation

George C. Thornton
National Wild Turkey Federation

Howard K. Vincent
Pheasants Forever

Steve Williams
Wildlife Management Institute

EX OFFICIO REPRESENTATION

*Association of Fish and Wildlife Agencies
Bureau of Land Management
U.S. Fish and Wildlife Service
Farm Service Agency
U.S. Forest Service
Natural Resources Conservation Service*

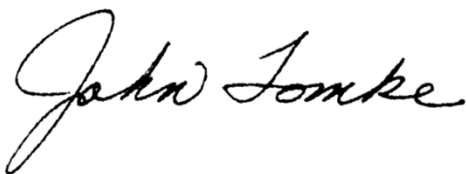
Council Coordinator

U.S. Fish and Wildlife Service
Division of Program & Partnership
Support
4401 N. Fairfax Drive, MS EA-3103
Arlington, VA 22203
P 703 358-2639
F 703 358-2548

- Adjustments in the number and configuration of Solar Energy Zones to accommodate projects with existing transmission capacity that have the most potential to be built;
- A refined list of “exclusion zones” where development is incompatible with other resources and will not occur, coupled with an enhanced analysis of potential impacts to important wildlife and habitat outside of identified solar resource zones and include additional exclusion zones for high use recreation areas;
- Explicit emphasis on protecting core wildlife habitats and habitat connectivity (wildlife corridors). Adequate analysis of habitat fragmentation and other impacts is necessary and must be applied to designated Solar Energy Zones, any future zones designations, and any individual solar energy projects proposed outside of a designated Solar Energy Zone;
- Commitment to complete the “regional mitigation plans” for solar energy zones that will help sustain fish, wildlife, water and access on public lands, enhance opportunities for landscape-scale conservation investment, and facilitate permitting efficiencies. The PEIS should articulate the elements of these plans, specifically that they are 1) based upon an ecological baseline, by which unavoidable impacts are assessed, 2) include transparent, consistent methodologies to assess impacts, and to translate those impacts into dollars, i.e. mitigation investments, including sufficient funding to manage and monitor the mitigation investments, 3) a 3rd party fiduciary structure to manage mitigation investments, 4) apply mitigation investments based on a prioritized conservation plan, and 5) include sufficient monitoring and subsequent adaptive management to ensure the assessment methodologies, conservation plan and mitigation investments are adequate relative to impacts over the life of the impacts;
- A workshop to explore the elements of a regional mitigation plan, and a pilot within the PEIS to test the elements;
- Greater developer incentives to prioritize zone-based solar development;
- Clarification of the process for identifying any future Solar Energy Zones and the consistent criteria that will be used to address new applications outside of identified Solar Energy Zones and exclusion areas; and
- Description of the steps towards a new competitive offering process for renewable energy on public lands that would better serve fish, wildlife, and recreation.

Tapping the rich solar energy resources found on our public lands is critical to creating jobs, improving our energy security, and stimulating the economy nationwide, from manufacturers to project developers. Guiding developers to places with the highest quality solar resource and the lowest potential for conflict with wildlife, access, and other values and uses is the smartest path forward. We believe the revised plan can work for both the industry and the special values of our public lands.

Sincerely,

A handwritten signature in black ink that reads "John Tomke". The signature is written in a cursive, flowing style.

John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Cc: Robert Abbey, Director, Bureau of Land Management