

April 18, 2024

Mr. Jeremy Bluma  
Acting Division Chief  
National Renewable Energy Coordination Office  
BLM Headquarters  
1849 C Street NW  
Washington, DC 20006

Comments submitted electronically via: <https://eplanning.blm.gov/eplanning-ui/project/2022371/510>

**RE: Support for Modified Alternative 5 with exclusion for big game migratory corridors and crucial winter range under BLM's Draft Utility-Scale Solar Energy Development PEIS/RMPA (DOI-BLM-HQ-3000-2023-0001-RMP-EIS).**

Dear Acting Chief Bluma,

The undersigned hunting and fishing organizations write in response to the Bureau of Land Management's (BLM) Draft Utility-Scale Solar Energy Development Programmatic Environmental Impact Statement and Resource Management Plan Amendment (DOI-BLM-HQ-3000-2023-0001-RMP-EIS) ("draft PEIS").

Migratory big game populations are likely to be disproportionately impacted by poorly sited utility-scale solar facilities because these facilities are high-fenced and impose a complete barrier to big game movement and use. Once severed, big game migration disruptions may be irreversible and unmitigable. Even outside of project fencing, habitat use reductions of 40% can persist as far as 2 km beyond these fence lines.<sup>1</sup> Avoiding big game migratory corridors and other connected, crucial seasonal habitats from the outset is key to preventing the loss of historic migrations that are critical for maintaining healthy big game populations and supporting quality hunting opportunities in Colorado and across the West.

In Colorado, the majority of the BLM lands proposed to be available for solar development under preferred Alternative 3 overlap Colorado Parks and Wildlife (CPW) mapped High Priority Habitat- not just for big game species but for other species' high-value habitats as well. The BLM can exclude these high-value habitats however and still have enough acreage available to successfully deploy utility-scale solar energy on Colorado BLM lands to meet its goals. **For these reasons, our organizations request that the BLM select a modified Alternative 5 that excludes Colorado's big game migratory and crucial winter range habitat.** Given that there is substantial overlap with these important big game habitats and other resources analyzed in the draft PEIS we believe BLM can make this adjustment in the final plan without additional analysis.

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<sup>1</sup> Sawyer, H. et al. (2022). Trade-offs between utility-scale solar development and ungulates on western rangelands. *Frontiers in Ecology and the Environment*, 20(6), 345-351. <https://esajournals.onlinelibrary.wiley.com/doi/10.1002/fee.2498>.

**Getting this right is critical to BLM conservation and energy goals, the State of Colorado’s conservation and energy goals, and of utmost importance to public lands users, including hunters, anglers, and other wildlife conservationists**

The data show that BLM can meet its renewable energy deployment goals for public land without sacrificing its big game habitat conservation and connectivity goals. BLM projects that 700,000 acres will be required across the 11 western states to meet the agency’s solar energy goals. The draft conservation alternative (Alternative 5) proposes to make 8.4 million acres available, which is 12 times what’s needed for development. BLM could make big game migratory corridors and crucial winter range exclusion areas for development, and still have more than enough acres available to fully meet their development needs.

The vast majority of Coloradans, and people across the West, confirmed in the latest State of the Rockies Project survey that they support increasing renewable energy production *but not* at expense of natural amenities, wildlife, or community values, and like us, survey respondents think it’s possible to do both simultaneously. 78% of Coloradans surveyed agree that “we can both increase the production of clean energy while also preserving natural areas, wildlife habitat, and the character of our communities.”<sup>2</sup>

The changes suggested below would help BLM successfully and consistently implement the following Department of Interior’s Secretarial Order 3356<sup>3</sup> and Secretarial Order 3362;<sup>4</sup> BLM’s instructional memorandum on connectivity;<sup>5</sup> and the Council on Environmental Quality’s Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors.<sup>6</sup> The changes suggested below would also support BLM’s goal of better aligning with state policies and objectives, including but not limited to Colorado Governor Polis’ Executive Order D2019-011 on conserving Colorado big game winter range and migration corridors,<sup>7</sup> Colorado Parks and Wildlife’s big game herd objectives,<sup>8</sup> and the policy solutions outlined and emphasized in the State of Colorado’s “Big Game Policy Report.”<sup>9</sup>

Finally, by avoiding conflict from the outset, the BLM and energy developers will be able to successfully deploy solar energy projects on BLM lands in a way that reduces adverse impacts and public pushback.

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<sup>2</sup> State of the Rockies Project. 2024 Conservation in the West Poll. States Combined [Interview Schedules]. Page 14, Question #35. Accessed April 2024 from: <https://www.coloradocollege.edu/other/stateoftherockies/documents/2024-poll-data/2024%20Western%20States%20Interview%20Schedule%20STATES%20Combined.pdf>

<sup>3</sup> Department of Interior, Secretarial Order 3356: Hunting, Fishing, Recreational Shooting, and Wildlife Conservation Opportunities and Coordination with States, Tribes, and Territories, accessed March 2024 from: [https://www.doi.gov/sites/doi.gov/files/uploads/signed\\_so\\_3356.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/signed_so_3356.pdf)

<sup>4</sup> Department of Interior, Secretarial Order 3362: Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors, accessed March 2024 from: [https://www.doi.gov/sites/doi.gov/files/uploads/so\\_3362\\_migration.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/so_3362_migration.pdf)

<sup>5</sup> Bureau of Land Management, Instructional Memorandum 2023-005: Habitat Connectivity on Public Lands, accessed March 2024 from: <https://www.blm.gov/policy/im-2023-005-change-1>

<sup>6</sup> Executive Office of the President, Council on Environmental Quality, 21 March 2023, *Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors*, accessed March 2024 from: <https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf>

<sup>7</sup> Colorado Governor Jared Polis, Executive Order D 2019 011: Conserving Colorado’s Big Game Winter Range and Migration Corridors, accessed March 2024 from: <https://cpw.state.co.us/Documents/Conservation-Resources/EOD2019011.pdf>

<sup>8</sup> Colorado Parks and Wildlife, Herd Management Plans, accessed March 2024 from: <https://cpw.state.co.us/thingstodo/Pages/HerdManagementPlans.aspx>

<sup>9</sup> Colorado Department of Natural Resources, Colorado Department of Transportation, 27 September 2021, *Opportunities to Improve Sensitive Habitat and Movement Route Connectivity for Colorado’s Big Game Species*, accessed March 2024 from: <https://drive.google.com/file/d/1JHEKKohPVRijSoCFQRTismQ8nNlyzHJ7/view>

## **Support for a modified Alternative 5 that excludes big game migratory and crucial winter range habitat**

Development within high priority big game habitat threatens to reduce quality opportunities for hunting, fishing, wildlife viewing, and other quality outdoor recreation opportunities that Colorado residents, visitors, businesses, and communities value so highly. It's critical that BLM avoid impacts first wherever possible, and *then* utilize the best available data, science, and management protocols to minimize and mitigate unavoidable adverse impacts through specific design, development, operations, and mitigation practices.

As currently drafted, the PEIS would only exclude solar development from big game migratory corridors and winter ranges where they are "identified in applicable land use plans to the extent the land use plan decision prohibits utility-scale solar energy development."<sup>10</sup> While Colorado BLM is working hard to update Resource Management Plans and Travel Management Plans as dictated by need and capacity, most Colorado land management plans do not include up-to-date big game data, science, or modern considerations for renewable energy development and the impact of such development. For example, the San Luis Resource Area RMP, Gunnison Resource Area RMP, and White River Field Office RMP are all over 25 years old (these plans are dated 1991, 1993, and 1997, respectively). Furthermore, Table 2.1-3 indicates that for big game, the exclusion status for alternatives analysis is "unmapped."<sup>11</sup> During the March 15, 2024 listening session hosted by BLM, we brought to the attention of the BLM facilitator that CPW and the Colorado state BLM office both have extensive, up-to-date data and maps related to big game migration and winter ranges. The facilitator invited submission of the maps and data. It's critical that BLM analyze and utilize CPW maps and data, as these represent the best available science, and we appreciate the BLM's invitation to submit these data.

To aid in this analysis, Colorado Wildlife Federation created an interactive web map showing [mapped big game High Priority Habitats and BLM-proposed lands to be available for solar energy development in Colorado](#).<sup>12</sup> The map clearly shows significant overlap between high-value, CPW-identified big game migration corridors and crucial winter ranges and BLM acreage proposed to be available for solar development applications. A few examples include:

- The Little Snake Field Office: Elk and deer migration corridors overlap a portion of Preferred Alternative 3 and Alternative 5 available solar development application areas.
- The White River Field Office: Deer migration overlaps a portion of Preferred Alternative 3 available solar development application areas.
- The Uncompahgre Field Office: Elk migration and deer migration overlap a portion of Preferred Alternative 3 available solar development application areas.
- In addition, elk and deer severe winter range overlap with the areas available for solar development within White River, Little Snake and Uncompahgre Field Office areas under BLM Preferred Alternative 3. Under draft Alternative 5, there is less overlap between severe winter range and lands proposed to be available for solar development within the Uncompahgre and White River Field Office areas, and little or no overlap within the Little Snake Field Office area.

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<sup>10</sup> Draft PEIS, Vol. 1, pg ES-17, Table ES-3: Proposed Resource Based Exclusion Criteria Common to All Action Alternatives

<sup>11</sup> Draft PEIS, Vol 1, pg 2-21, Table 2.1-3. Proposed Resource-Based Exclusion Criteria Common to All Action Alternatives

<sup>12</sup> Colorado Wildlife Federation and Rocky Mountain Wild. BLM Solar PEIS 2024 Alternatives and CPW High Priority Habitat [web map]. Accessed April 2024 from: <https://experience.arcgis.com/experience/e8f8009270c047f3bc0bb6d46b0776b6>

These data highlight just a few of the areas in Colorado “with known high potential for resource conflicts.”<sup>13</sup> Areas with known resource conflicts, such as big game migratory and crucial winter range habitat, should be excluded to prevent undue conflict and administrative burden at the project-level.

We believe that relying solely on the conditions described in Table ES-3, Table 2-22, Appendix H3, and elsewhere in the draft PEIS for protecting high-value big game migratory corridors and winter ranges will be insufficient to meet this plan’s purpose and need; federal and state directives and conservation goals described in section one above; and public interest in the need to develop renewable energy without sacrificing public lands, conservation values, or wildlife habitat, also described in section 1 above.

### **In closing**

The undersigned organizations request that BLM exclude CPW-mapped big game migratory and crucial winter range habitats from solar development in Colorado outright (not dependent on their inclusion in an applicable land use plan under the draft proposed conditions) as these areas have ‘known high potential for resource conflicts.’<sup>14</sup> In Colorado, these most critical habitats include CPW-mapped big game migration corridors, pinch points (with a ½ mile buffer around wildlife crossing infrastructure pinch points), and the most crucial winter ranges mapped for each big game species (for example, severe winter range for elk, mule deer, and pronghorn, and general winter range for bighorn sheep). Given that there is substantial overlap with these important big game habitats and other resources analyzed in the draft PEIS we believe BLM can make this adjustment in the final plan without additional analysis.

By excluding the highest-value big game habitats, the BLM would be directing solar development to lower-impact areas thereby avoiding undue conflicts and simultaneously meeting federal and state goals, directives, and priorities for renewable energy development and protection of important wildlife habitat and quality hunting opportunities.

Thank you for considering our request for a modified Alternative 5 that excludes Colorado’s big game migratory and crucial winter range habitat. In addition, we incorporate by reference the comment letter submitted by the National Wildlife Federation, Theodore Roosevelt Conservation Partnership, Trout Unlimited, et. al.

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<sup>13</sup> Draft PEIS, Vol 1, pg 1-3, Section 1.1.1 BLM’s Purpose and Need: *“The purpose of the proposed action is to facilitate improved siting of utility-scale solar energy development by identifying areas of BLM-administered lands where solar energy development proposals may encounter fewer resource conflicts than in other areas as “solar application areas”, and identifying areas of BLM-administered lands with known high potential for resource conflicts as “exclusion areas”.*”

<sup>14</sup> Draft PEIS, Vol 1, pg 1-3, Section 1.1.1 BLM’s Purpose and Need: *“The purpose of the proposed action is to facilitate improved siting of utility-scale solar energy development by identifying areas of BLM-administered lands where solar energy development proposals may encounter fewer resource conflicts than in other areas as “solar application areas”, and identifying areas of BLM-administered lands with known high potential for resource conflicts as “exclusion areas”.*”

Sincerely,

**Colorado Bowhunters Association**

**Colorado Chapter of Backcountry Hunters & Anglers**

**Colorado Outfitters Association**

**Colorado Wildlife Federation**

**Gunnison Wildlife Association**

**National Wildlife Federation**

**Rocky Mountain Big Game Recovery**

**Safari Club International**

**Theodore Roosevelt Conservation Partnership**