



The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

February 13, 2017

Sweetwater Solar Energy Project
c/o Crystal Hoyt
BLM Rock Springs Field Office
280 US Highway 191
Rock Springs, WY 82901

Dear Ms. Hoyt,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Sweetwater Solar, LLC grant application for a right-of-way with the Bureau of Land Management (BLM) Rock Springs Field Office proposing to construct, operate, maintain, and decommission the Sweetwater Solar Energy Project (Project).

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this project impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

WDA appreciates the idea of new and innovative renewable energy and how these projects could benefit the citizens of Wyoming. Specifically, solar energy at a large scale is new to not only Wyoming BLM, but also to WDA and other Cooperating Agencies. We offer the following comments to consider and integrate into the National Environmental Policy Act (NEPA) analysis.

The scale of the Project components, including chain link fencing surrounding the entire project area, thousands of solar panels, new roads and disturbance, and essentially eliminating potential grazing, wildlife, and other uses. We believe this indicates a more in depth analysis of all potential impacts is required. We believe an Environmental Assessment is insufficient, and the BLM must analyze the Project under and Environmental Impact Statement.

WDA has a number of concerns regarding direct impacts to livestock grazing permittees. We understand previous solar projects in other states have integrated domestic sheep and cattle grazing. WDA insists the NEPA analysis considers the potential impacts the Project has on grazing management, as well as livestock trailing, and provide adequate mitigation for the loss of forage to livestock.

We are concerned the level of disturbance and difficulty to achieve interim and final reclamation will cause long-term resource damage and reduce native vegetation. Invasive weeds such as halogeton will make the site toxic to sheep. Cheatgrass, another invasive, will undoubtedly increase fire hazards and cause long-term damage to the ecological site.

An additional concern WDA has is in regards to the soils. Little is known about the how solar projects impact soil dynamics. Given the fragility of many soil types in Wyoming, a small change in temperature could lead to impacts. At

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this time we are not aware of what these may be given there is little to no research available. WDA recommends developing reclamation and invasive weed plans; along with including additional peer reviewed research on the impacts solar has on soils.

As proposed, solar energy does not meet much of the multiple use criteria BLM offices are tasked to provide. WDA recommends BLM consider alternative locations for the project. We believe there are adequate areas with existing disturbance, which may have proximity to rights of ways, will not increase disturbance of native vegetation, and ultimately still meet the multiple use mission of the agency. The proposed location is a site with little to no existing disturbance and will likely have significant direct and cumulative impacts.

We also recommend including research to identify the impacts of the Project on wildlife, vegetation, and soil interactions. This is commonly required in wind energy projects.

Again, we appreciate new ideas and look forward to working closely with you as a Cooperating Agency to develop and review the upcoming NEPA analysis. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
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