



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

March 11, 2020

Crystal Hoyst
Project Manager
BLM Rock Springs Field Office
280 U.S. Hwy. 191 North
Rock Springs, WY 82901

Dear Ms. Hoyt,

Following are the Wyoming Department of Agriculture (WDA) Scoping comments regarding the Bureau of Land Management (BLM), Rock Springs Field Office, Raven Solar Project (Project).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The WDA is appreciative of the opportunity to comment on the proposed Project. As a Cooperating Agency, we are disappointed in the lack of inclusion and communication. We were only notified on Monday February 10, 2020 for the open house on Thursday February 13, 2020. The previous communication was on October 9, 2019. Given our previous concerns on Sweetwater Solar, we urge BLM to proactively include Cooperating Agencies through consultation, cooperation, and coordination on the proposed Project. We offer the following comments to the Plan of Development and consideration for inclusion in the National Environmental Policy Act (NEPA) analysis.

We are genuinely concerned the BLM is so eager to issue a decision on a new solar project when the negative impacts to the previous Sweetwater Solar project are still surfacing. The comments on pronghorn migration were largely ignored in the Environmental Assessment (EA) for Sweetwater Solar and within the first winter, the pronghorn were funneled onto the highway due to the fence and project configuration. We believe the BLM, and the Project proponent must take a more serious approach to the cumulative impacts associated with the previous project and consider them in the proposed Project. Additional cumulative impacts to incorporate into the EA are prospective projects planning to tie into the Raven Solar substation. As a Cooperating Agency, we would not support ongoing projects tentatively proposed to utilize the Raven Solar substation and not finding out this information under this EA.

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WDA also provided concerns on Sweetwater Solar regarding the significant impacts to the livestock grazing industry. Some of those concerns pertained to the perimeter fencing, vegetation removal, soil erosion, soil sterilization, and the ability to revegetate and reclaim the site to the original vegetation pre-project disturbance. We believe our comments were largely ignored with little to no impact outside of the Animal Unit Months lost.

The Plan of Development states *"The project proponent will discuss the loss of forage with the BLM and the livestock grazing permittee."* Our concern is the Project proponent will only "discuss," the loss of forage, but provide no solutions to mitigate or offset the inevitable impacts for livestock grazing permittees. We respectfully request the project proponent and BLM work with WDA to discuss possible solutions to the grazing and trailing impacts.

We believe the Project proponent and BLM should work more closely with the impacted livestock grazing permittees to mitigate these impacts. We support developing the project to allow sheep or goat grazing inside the Project fencing as a tool to meet desired conditions for weed suppression and vegetation management. We would recommend the project analyze a stock well to pipe water to nearby troughs throughout the year to support trailing and grazing. We are aware of cattle grazing permittees who are currently hauling water in the immediate area. Raven Solar should work with these permittees to help identify appropriate water locations. The water could also potentially benefit wildlife as well.

Finally, we would request the NEPA analyze an alternative with a different location than the proposed location. Permittees have notified us of a preference to develop southwest of the highway to reduce further impacts of the river corridor. We believe the cumulative impacts analysis could inform the BLM of the potential benefits from moving to a new location.

We also would request the proposed Project and subsequent NEPA analysis consider different types of fencing. We are unaware of any laws, regulations, or policies requiring the chain link and barb wire fencing found around the Sweetwater Solar project or in the proposed Project's Plan of Development. The fencing prohibits even non-game species from entering the project, which we believe does not meet the intent of multiple-use.

The Plan of Development discusses weed control measures and revegetation. As stated earlier, the previous Sweetwater Solar project is still in its infancy and little is understood of results of the regrowth and weed infestation following installation. We urge BLM and the Project proponent carefully consider what type of weeds establish and the ability to control these weeds in a timely manner. Of particular concern, weeds such as cheat grass and halogeton will likely establish and prevail, causing long-term impacts to the Project's location and adjoining lands. We respectfully request the NEPA include the proposed Noxious Weed Management Plan with the NEPA analysis as an appendix to ensure we have ample opportunity to review and comment prior to implementation.

WDA is requesting BLM to clarify and differentiate revegetation and reclamation. We are concerned the soil impacts are largely unknown from being baked from solar panels to the lack of microbes from exclusion of

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livestock and wildlife. The project should have final reclamation requirement upon completion and decommissioning of the project. We recommend providing actual pre and post data from the Sweetwater Solar for soils and vegetation under the new NEPA analysis for Raven Solar.

We look forward to working more closely with your staff on this project. 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
Wyoming State Grazing Board
Wyoming Association of Conservation Districts
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Rock Springs Grazing Association: Don Shram