



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

April 24, 2018

Bureau of Land Management
Rock Springs Field Office
Sweetwater Solar Energy Project
Environmental Assessment

Crystal Hoyt
Reality Specialist
Rock Springs Field Office
280 Highway 191 N.
Rock Springs, WY 82901

Dear Ms. Hoyt,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Environmental Assessment (EA) for the Sweetwater Solar Energy Facility (Project) within the Rock Springs Field Office (RSFO) of the Bureau of Land Management (BLM).

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 affects our agriculture industry, our natural resources, and the welfare of our citizens, it's 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 changes RSFO made from the Cooperating Agency Review comments to the proposed EA. WDA believes the Project will result in significant impacts and the BLM should have analyzed the Project under an EIS. Much of the EA utilizes words such as "minor," "negligible" and "potential" to reduce the negative view of the project. However, the reality is, Wyoming has never had a commercial scale solar project and much of the actual impacts are unknown.

For instance, the perimeter fence is described on page 2-6 as "6 feet of chain link topped with three-strand barbed wire for a total height of approximately 7 feet." This fencing is equivalent to prison fencing and will exclude wildlife and livestock. Figure 2.3-1 identifies "proposed exclusion fencing" and "perimeter fence." WDA encourages BLM to ensure clarity and consistency in the decision record and provide a more thorough analysis of how this type of fence is significantly different and likely results in more impacts than analyzed in the EA.

WDA believes BLM likely under-analyzed the impacts of the project to vegetation and soils. Page 4-4 states "Vegetation clearing would be conducted by cutting shrubs 4 to 12 inches from their base while leaving the root structure intact to minimize soil disturbance, vegetative loss, and spread of noxious weeds." While we support best management practices to reduce soil erosion, the EA completely avoids addressing the impacts after the initial vegetation is

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removed. Roots and debris will only temporarily hold soils intact, thus the potential for future erosion may actually increase.

Page 4-5 states *"potential indirect impacts to vegetation would include potential changes to the vegetation community as a result of shading by the solar arrays."* We believe this is a direct impact to vegetation and soils. The EA avoids the negative impacts from the solar panels and increased heat can change soil chemistry and ultimately limit the ability to successfully reclaim the project area.

As a result of using this perimeter fence, no grazing will occur inside the fenced areas for 30 years (p.4-6). However, the EA should state *"for a minimum of 30 years."* There is no assurance the project will not extend beyond 30 years or the land utilized for some other permitted use.

Wildlife and livestock play an important role in removing decadent vegetation, reducing wildfire, and increasing organic matter to soils. Again, the EA analysis provides no information of how removing grazing will impact soils, soil chemistry, and the long-term ability to revegetate the site following decommissioning.

WDA believes the EA underestimates the impacts of the Project to loss of vegetation and Animal Unit Months (AUMs). Page 4- 6 states *"Based on the data collected, there would be a long-term loss of approximately 28 AUMs in the Rock Springs Allotment for the term of the Project."* The EA neglects to identify the 28 AUMs as a yearly forage allocation and the BLM should have multiplied the AUM loss to a minimum of 30 years.

From the onset of this project WDA supported the idea of renewable energy projects such as solar energy, but urged the BLM to find a location with existing disturbance, one which was in the immediate area. We maintain our position regarding this and future development of solar energy projects. We appreciate the opportunity to comment and look forward to working 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
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