

Date: April 15, 2024

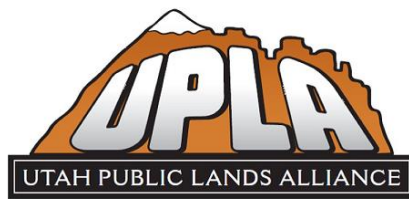
Bureau of Land Management  
Attn: Draft Solar EIS  
1849 C Street NW  
Washington, DC 20240

RE: Draft Solar PEIS (Document #DOI-BLM-HQ-3000-2023-0001-RMP-EIS)

Dear BLM Planning Team,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the [Draft Programmatic Environmental Impact Statement for Utility-Scale Solar Energy Development \(Document #DOI-BLM-HQ-3000-2023-0001-RMP-EIS\)](#)<sup>1</sup>, hereto forward referred to as the BLM Western Solar Plan, or with the acronym WSP. Many of our members and supporters live near and/or recreate throughout the 22,767,896 acres of the Bureau of Land Management (BLM) Planning Area in Utah that will be impacted by the WSP. This letter of comment shall not supersede the rights of other UPLA agents, representatives, or members from submitting their own comments; the BLM should consider and appropriately respond to all comments received for the WSP.

UPLA is a non-profit organization representing over 5,800 members; we champion responsible outdoor recreation, active stewardship of public lands, and encourage members to exercise a strong conservation ethic including “leave no trace” principles. We champion scrupulous use of public lands for the benefit of the general public and all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with public land managers and other recreationists. Our members participate in outdoor recreation of all forms to enjoy federally and state managed lands throughout Utah, including BLM managed public lands. UPLA members visit BLM public lands to participate in motorized and human-powered activity such as off-roading, camping, hiking, horseback riding, sightseeing, photography, fishing, wildlife and nature study, observing cultural resources, and other similar pursuits on a frequent and regular basis throughout every season of the year. UPLA members and supporters have concrete, definite, and immediate plans to continue such activities on BLM managed public lands throughout the future.



## **General Comments**

UPLA recognizes the positive mental, spiritual, physical, and social benefits that can be achieved through outdoor recreation. We also recognize that outdoor recreation provides business owners and local communities with significant financial stimulus. Of foremost importance to our motivations for this comment letter: our members are directly affected by management decisions concerning public land use in BLM managed public lands, including and especially, decisions that impact the scope and implementation of the multiple-use mandate.

Our members subscribe to the tenets of:

- Public access to public lands now, and for all future generations
- Active stewardship for the benefit of all US citizens who collectively own our public lands as part of our national endowment
- Effective management of public lands to ensure the safety of all who enjoy them
- Conservation of ecological, cultural, and archeological resources in balance with implementation of the Congressional mandate for multiple-use public land management

UPLA members as well as the general public desire access to public lands now and in the infinite foreseeable future. Restricting access today deprives the public of the opportunity to enjoy the many natural wonders of public lands. UPLA members and the general public are deeply concerned about the condition of the environment and public safety. They desire safe means to access public lands to engage in conservation efforts as well as outdoor recreation. UPLA supports the concept of managed recreation and believes it is prudent to identify areas where both motorized and non-motorized use is appropriate.

The [BLM manages over 22 million acres of public land in Utah](#)<sup>2</sup>, representing 42% of the total land mass in this state. Utah's public lands offer the primary source for the public to enjoy outdoor recreation. Reduction or elimination of public access to BLM managed land thus bears the potential to increase user conflicts and resource damage by removing sufficient access to public lands for all forms of outdoor recreation.

As currently written, each the proposed alternatives presented in the WSP would negatively impact UPLA members, as well as all members of the general public who enjoy outdoor recreation on BLM managed lands, by significantly minimizing their ability to access public land. The WSP fails to provide a true recreation alternative as required by NEPA. While Alternative 1 would not change existing management practices, it would therefore also fail to optimize outdoor recreation as a high-value use across the 22.8 million acres that are encompassed within BLM managed lands in Utah. Alternatives 2, 3, 4, and 5 would all reduce



public access to outdoor recreation in a variety of ways. The alternatives presented in the WSP serve to diminish (at best) or eradicate (at worst) the multiple-use mandate by which the BLM is required to manage public lands.

**We support any additional comments from individuals, groups, associations, and the general public that encourage the BLM to uphold their mission and commitment to the public to manage public lands in Utah in a manner that maximizes public access, and sustains the health, diversity, and productivity of the land for the use and enjoyment of present and future generations. We strongly advocate against any components of the WSP that would diminish or eliminate public access to BLM managed lands in this region.**

### **Off-Highway Vehicle Recreation**

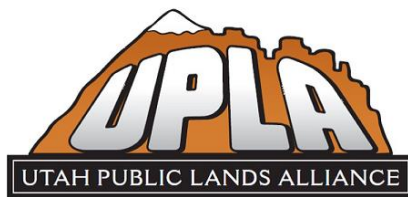
The 2023 Draft Solar PEIS Volume 1 notes in Section 5.14 Recreation, 5.14.1 Direct and Indirect Impacts, 5.14.1.1 Construction and Operations (page 5-159)<sup>1</sup> that:

*“Under each of the Action Alternatives, Special Recreation Management Areas (SRMAs) have been excluded from solar energy development; thus, these areas could be affected only indirectly by solar energy facilities located close to their boundaries.”*

*“Indirect impacts on recreational use would occur primarily on lands near the solar energy facilities and would result from the change in the overall character of undeveloped BLM-administered lands to an industrialized, developed area that would displace people who are seeking more rural or primitive surroundings for recreation. Changes to the visual landscape, impacts on vegetation, development of roads, and displacement of wildlife species resulting in reduction in recreational opportunities could degrade the recreational experience near where solar energy development occurs.”*

**We appreciate that the BLM has excluded land within SRMAs from solar energy development, and we urge the BLM to maintain this exclusion within the final draft regardless of which Alternative or combination of Alternatives is selected.**

However, UPLA is concerned that plans for utility-scale solar energy development as described in the WSP will bear insurmountable negative impact on OHV recreation. This negative impact will directly affect our members and the communities and economies that are situated near the range of available land for solar projects. While all of the 5 Alternatives proposed for the Western Solar Plan exclude SRMAs from solar energy development, there is a great deal of



indirect negative impact on the quality and viability of the OHV riding experience at SRMAs if solar facilities are developed near to the borders of SRMAs.

Displacement of wildlife is a chief concern. The negative impacts of solar facilities on wildlife are of importance to UPLA members and all OHV enthusiasts given that a core reason why we enjoy OHV recreation is to get out in nature to observe wildlife in its native habitat. Solar facilities destroy habitat for all species that inhabit the footprint where the facility is constructed; they displace wildlife, leading to higher concentrations of species in surrounding areas as species are forced to flee the solar facility development to survive. This will inflict harm on wildlife as there will be more competition for food and habitat for all species who must flee a solar facility development, including mammals, birds, amphibians, reptiles, and insects.

Solar facilities near SRMAs will also displace OHV riders. The character of the land surrounding each solar facility will be altered from its natural state and will become industrialized. This will drive OHV enthusiasts to seek recreation in other areas where public lands remain in a character of natural state. This will create a higher concentration of people off-roading in other OHV areas, which will create new negative impact on natural and cultural resources in those areas, thus jeopardizing the long-term viability of other OHV areas, and thereby inflicting harm directly on the OHV recreation community.

Additionally, page 5-159 of the 2023 Draft Solar PEIS Volume 1 (Section 5.14 Recreation, 5.14.1 Direct and Indirect Impacts, 5.14.1.1 Construction and Operations)<sup>1</sup> states that:

*“Many BLM field offices have completed planning activities to designate lands for OHV use. Under these plans, areas open to application for solar energy development may be available for OHV use, and solar energy development in these areas would displace this use. Applications for solar energy facilities may include areas containing designated open OHV routes, thereby eliminating public access along those routes.”*

There is vast potential for negative impact on OHV recreation if utility-scale solar facilities are developed on lands with designated open OHV routes, open OHV riding areas, and in lands that are near the borders of SRMAs. Solar developments are likely to be constructed adjacent to existing highways, which could cut off access to major OHV route systems that lie beyond the solar development. If elimination of OHV access is a possibility for any solar development, the project must go through the NEPA process as is required for any change that impacts multiple use management. This would provide for the analysis of potential mitigations, strategies to avoid negative impact on multiple use objectives, and preservation of the public’s vested interest in public land management decisions through opportunities for public comment.



Furthermore, we are concerned that “solar development” may be defined very broadly to include all forms of improvements to solar infrastructure including transmission lines and maintenance roads, which would enable the WSP to be used as a tool to eliminate many miles of OHV access without the Congressionally required due process of NEPA analysis.

It is critical for all BLM staff who are involved in planning and implementation of the WSP to note: closure or restriction of OHV access will also negatively impact many other multiple uses such as grazing access, dispersed camping, hunting, fishing, equestrian, hiking, among many other forms of recreational and economic use of our public lands.

**For the reasons cited above, as remedy, we ask the BLM to alter the language of the WSP Draft PEIS to explicitly state that the following must be excluded from the range of lands available for construction of solar projects within each of the 5 Alternatives:**

- **All designated OHV routes**
- **All open OHV riding areas**
- **All Special Recreation Management Areas, and lands near the borders of Special Recreation Management Areas**

### **Unsuitable Use of Public Lands for Solar Development**

An overarching element of our concern over the content and direction of the WSP is that solar facility development is not suitable for construction on America's public lands. Public lands are intended to be used, stewarded, and protected for the benefit of all Americans. Solar facilities destroy the recreational, resource, cultural, and ecological values of our public lands. Solar facilities are best suited for urban and developed areas - such as rooftops in cities and elevated coverings over parking lots. One of the issues that the BLM has noted repeatedly throughout the Draft PEIS for the WSP is a desire to place solar facilities near existing power transmission lines. Our public lands are rural in nature, and thus inherently distant from transmission lines, therefore they are unsuitable sites for any solar development, especially those at utility-scale. Constructing solar facilities in urban, developed areas is far more efficient as transmission lines are already located in near proximity.

### **Closing**

We would like to close by once again calling your attention to the rights and interest that UPLA members, all outdoor recreationists, and the general public have as vested stakeholders of the BLM-managed lands contained within the footprint of the WSP. We encourage the BLM to uphold their alignment with the BLM mission and operating guidelines, their responsibility to



manage our public lands for the benefit of American citizens within the context of the multiple use objective, and their accountability to operate within the scope of congressionally-granted boundaries as contracted managers of our nation's public lands - the citizenry's prized national heritage.

Utah Public Lands Alliance would like to be considered an interested public for the WSP. Information can be sent to the following address and email address:

Rose Winn  
Utah Public Lands Alliance  
PO Box 833  
St. George, UT 84771  
[rose@utahpla.com](mailto:rose@utahpla.com)

Sincerely,

Rose Winn  
Natural Resources Consultant  
Utah Public Lands Alliance

### **References**

1. US Department of the Interior. Bureau of Land Management. Utility-Scale Solar Energy Development PEIS/RMP. Accessed and referenced April 2024. <https://eplanning.blm.gov/eplanning-ui/project/2022371/510>
2. US Department of the Interior. Bureau of Land Management. What We Manage in Utah. Accessed and referenced April 2024. <https://www.blm.gov/about/what-we-manage/utah>