



April 18, 2024

Jeremy Bluma
Bureau of Land Management
1849 C Street NW
Washington, DC 20240

Submitted electronically to jbluma@blm.gov, solar@blm.gov, and rmsuazo@blm.gov

**RE: Draft Utility-Scale Solar Energy Development PEIS/RMPA
(DOI-BLM-HQ-3000-2023-0001 RMP-EIS)**

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is the leading Arizona based 501c-3 non-profit organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as providing educational opportunities for outdoor enthusiasts on issues important to their passions. AZSFWC's 40 member, affiliate, and associate groups reach across the spectrum of wildlife conservation, hunting, angling, shooting sports, outdoor recreation, and businesses, representing more than 25,000 people in the state.

AZSFWC appreciates the opportunity to provide comments on the Bureau of Land Management's (BLM's) proposed Draft Utility-Scale Solar Energy Development Programmatic Environmental Impact Statement (PEIS) and Resource Management Plan Amendment.

AZSFWC recognizes the importance of planning efforts for renewable energy projects that contribute to regional and state economic growth needs. We have been a longtime advocate for multiple use on our public lands but also strongly support enhanced access to the recreating public, as well as conservation of the landscapes involved and the wildlife that resides on those lands. These issues are increasingly more important as Arizona and the neighboring Western states' populations continue to grow, and the pressures of development gain more traction.

This is even more critical when considering the BLM designated 3,380,877 acres for solar variances in Arizona in 2012. Secretary Salazar signed the Record of Decision on 10/12/12, notably excluding from any solar development considerations were lands in the Grand Canyon Parashant National Monument and Vermillion Cliffs National Monument (VCNM), which left 793,340 acres available to the Arizona Strip RMP for variance consideration.

President Biden's designation of the Ancestral Footprints of the Grand Canyon National Monument (GCNM) on 8/8/23 further reduced the solar variance acreage available for the Arizona Strip RMP. However, that designation left out a section of land between the GCNM and VCNM outside of any neighboring National Monuments on the eastern side of the Strip, and north of the Kaibab National Forest to the Utah border.

Please refer to the BLM's Kaibab Area Draft Solar PEIS Alternative 3 Mule Deer Migration map attached.

The BLM's preferred alternative (Alternative 3) in the draft PEIS identifies lands as open for solar development that includes mapped big game migration corridors and critical winter ranges for the Kaibab North mule deer herd, as well as the Paunsaugunt herd that travels south from Utah to winter in northern Arizona. That section of land is the primary migration corridor for mule deer from the Kaibab National Forest in Arizona and the Paunsaugunt Plateau in Utah.

AZSFWC is not opposed to solar developments, as long as they are sited properly, don't infringe on sensitive habitat and species, are placed where they have minimal impact on the land and landscape, and do not have a negative impact or effect on wildlife. The Kaibab deer herd offers some of the most sought-after mule deer buck hunting in the world! The loss of winter range and migration habitats to utility-scale solar development would have devastating impacts on this herd.

Secretarial Order 3362 (Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors) and Instruction Memorandum IM 2023-005 (Habitat Connectivity on Public Lands), directs the BLM to "...ensure habitat connectivity, permeability, and resilience is restored, maintained, improved, and/or conserved on public lands."

AZSFWC believes this Secretarial Order alone should mandate an exclusion of this corridor from any consideration of utility-scale solar development. Habitat connectivity between the Kaibab and Paunsaugunt herds would be disrupted, permeability would be blocked by fences, and habitat destroyed in the process. Avoiding any type of development in this corridor is critical to maintaining the health of these deer herds!

Just today, 4/18/24, DOI Secretary Haaland announced the new BLM Public Lands Rule. This Rule "will help conserve wildlife habitat, restore places impacted by wildfire and drought, expand outdoor recreation, and guide thoughtful development".

<https://www.blm.gov/press-release/biden-harris-administration-finalizes-strategy-guide-balanced-management-conservation>

In a DOI Press Release on 3/29/24, "This Week at Interior!", among other items, it was announced, "there's new funding on the way to help restore habitat connectivity and secure key migration corridors for wildlife in the American West".

<https://www.youtube.com/watch?v=NJCXwfszds8&t=184s>

The last few years have seen a recognition of the importance of habitat connectivity and wildlife migration corridors across the Western states, including in Arizona. "Safeguarding Wildlife Corridors" was the focus at the "Corridors, Connectivity, and Crossings" conference in Tucson, AZ on 5/9-10/23.

<https://www.pewtrusts.org/en/research-and-analysis/articles/2023/07/21/changing-climate-heightens-need-for-safeguarding-wildlife-corridors>

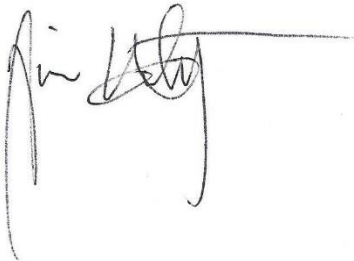
Wildlife conservation organizations (WCO's) in Arizona have been funding habitat projects of varying degrees across the state for decades in a cooperative fashion with the Arizona Game and Fish Department (AZGFD). In the last five years alone around the North Kaibab and Arizona Strip, over \$1.1M has been expended on the ground for twenty projects. A new RCPP was developed this past January with AZGFD, the Mule Deer Foundation, and NRCS, with a commitment of another \$1M each from AZGFD and NRCS.

AZSFWC believes all the Federal and State initiatives, funding allocations, and focus on enhancing, safeguarding, and restoring habitat connectivity and wildlife migration corridors, coupled with on the ground work by WCO's can lead to only one conclusion regarding the potential utility-scale solar development being proposed in Alternative 3; it should be excluded, and other alternatives considered.

AZSFWC appreciates the excellent partnership and working relationship with Arizona's BLM staff and the AZGFD when it comes to outdoor recreation, access issues, and of course wildlife management in Arizona. We would ask that the same level of cooperation and coordination be extended to the utility-scale solar developments that are currently being assessed to ensure that critical wildlife habitat is excluded from being developed. As we noted above this is critical for the viability of the Kaibab North and Paunsaugunt mule deer herds.

AZSFWC and the 24 member organizations in the following list, thank you for considering our concerns and input!

Yours in Conservation,

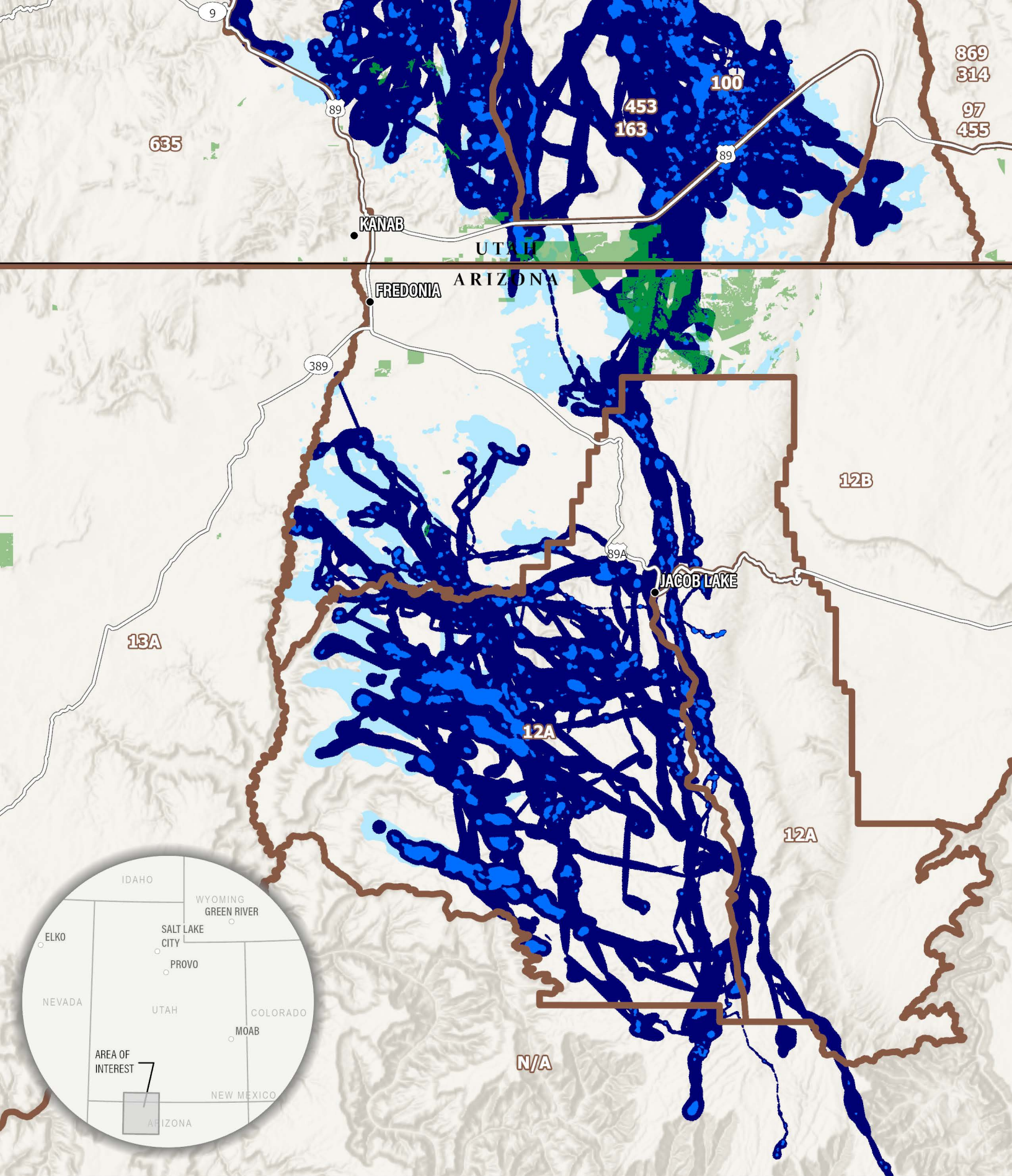
A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht
Executive Director



AZSFWC Member Organizations Opposing Utility-scale Solar Development in Alternative 3 of the BLM Solar Draft PEIS

Anglers United
AZ Antelope Foundation
AZ Bowhunters Association
AZ Chapter of Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Flycasters Club
AZ Houndsmen's Association
AZ Mule Deer Organization
AZ Outdoor Adventures
AZ Outdoor Sports
AZ Predator Callers
Conservation First USA
Conserve and Protect AZ
Diablo Trust
Into the Wild Outdoors
Mogollon Sporting Association
Mule Deer Foundation
Outdoor Experience 4 All
Southern AZ Quail Forever
Southwest Wildlife Foundation
Theodore Roosevelt Conservation Partnership
Yuma Valley Rod & Gun Club



BLM Draft Solar PEIS Alternative 3

- BLM land proposed to be available for solar energy development
- Hunting Units

Mule Deer Herd Migration

- Migration Route
- Stopover
- Winter Range

