Thank you for your comment, I. Miley Gonzalez.

The comment tracking number that has been assigned to your comment is SolarM60131.

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Solar Energy Development PEIS
Comment ID: SolarM60131

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Comment Submitted:

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August 3, 2009

Solar Energy PEIS
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To Whom It May Concern:

This letter is in response to the June 29, 2009, notice in the Federal Register soliciting comments with respect to solar energy study areas on Bureau of Land Management (BLM) administered lands. New Mexico Department of Agriculture (NMDA) understands the need for and supports the development of renewable energy sources to provide for current and future energy demands.

Proposed solar study areas in New Mexico encompass over 120,000 acres of BLM-administered lands. NMDA is concerned with the impact that removing these lands from multiple-use status will have on livestock production operations currently permitted to graze in these areas. Our analysis identifies 13 grazing allotments with land in the proposed solar energy study areas. While the degree to which solar energy projects may affect each allotment will vary greatly depending on the location of facilities and affected area in each allotment, NMDA encourages BLM to consult and coordinate with all permittees potentially affected by this proposal so impacts to their operations can be identified and analyzed.

NMDA is also concerned with the amount of water required for certain types of solar energy collection facilities. Parabolic trough and central tower systems typically use steam to generate electricity. These steam powered generators can require large amounts of water for cooling purposes. This increased demand for a limited water supply could have adverse affects on local water users, both agricultural and municipal.

Utility scale solar energy collection facilities typically result in the removal of vegetation over large areas. The loss of vegetation can significantly increase the rate of soil loss to wind and water erosion. Any plans for a solar energy facility should include measures to mitigate erosion.

Surface disturbance also creates an opportunity for noxious and invasive plant species to become established and spread to adjacent areas, which could negatively impact resource conditions for the state overall as well as individual grazing allotment permittees. A weed control program would need to be developed and incorporated into planning for facilities and roads. Considering the loss of native vegetation from a watershed health perspective, a net decrease in overall watershed health may occur as a result of solar energy development. This could be mitigated by the inclusion of funding for vegetation management projects in nearby areas that restore degraded lands such a BLM's Restore New Mexico program.

Thank you for the opportunity to comment on this important matter.

Sincerely,

I. Miley Gonzalez, Ph.D.
Director/Secretary

IMG/jm/lo