

Thank you for your comment, Kenneth Lytle.

The comment tracking number that has been assigned to your comment is SolarM60191.

Comment Date: September 13, 2009 09:32:53AM
Solar Energy Development PEIS
Comment ID: SolarM60191

First Name: Kenneth
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Last Name: Lytle
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Privacy Preference: Don't withhold name or address from public record
Attachment: Ken's solar comment letter.doc

Comment Submitted:

Please see attachment for my comments.

September 8, 2009

Solar Energy PEIS
Argonne National Laboratory
9700 South Cass Avenue – EVS/900
Argonne, Illinois 60439

RE: Comments to the Solar Programmatic Environmental Impact Study

To Whom It May Concern:

My family has been ranching in Nevada for almost 150 years, and I am a fourth-generation rancher in that same business. For over 100 years we have been using the area that you have labeled Dry Lake Valley North on your maps outlining proposed solar locations. The Simpson allotment and everything north of that constitutes our entire winter/spring grazing allotments where our cows graze from November through April. Without the use of this area, we would be forced out of the cattle ranching business. Not only do we use this area, but four other large ranching operations operate here as well. I feel that there is only one section of this proposed area that may be suitable for solar and that would be the portion labeled as the Ely Springs Cattle and Sheep allotments. Recently that section of the proposed area was purchased by Vidler Water, a company that has expressed a desire to house solar facilities on its allotment.

Besides being a crucial area for some of Lincoln County's largest ranching operations, I feel that the Dry Lake Valley North area is also unsuitable for solar development for other reasons. First of all, one of the main types of vegetation that grow in the area is white sage (or winter fat), a very delicate plant that is ideal for grazing. This plant is easily destroyed by man-made traffic and can not be reestablished. If a plant dies, it is gone forever. Dry Lake Valley North definitely represents some of the best winter grazing land in the state of Nevada. It seems ludicrous that this area would even be considered as a site for solar facilities. Secondly, the area is very dusty. Most times of the year, a fine, powdery silt becomes airborne since some degree of wind is usually blowing. I believe dust and solar facilities don't mix well. Next, the ranchers in the area not only lose all or most of their winter AUMs (animal units per month), but they also lose thousands of summer AUMs since it is impossible to sustain their herds without the winter portion. Most importantly, these ranchers also lose their stock-based vested water rights (all of these ranches own a considerable amount of vested water rights dating back into the 1800s) since they have little or no cattle to show beneficial use. I believe compensating these ranchers for their water losses (property which they own) would prove to be very costly. Finally, these ranching operations are very important to the economy of Lincoln County; it is essential that this area of Dry Lake Valley remain intact for these ranches to survive.

Recently at a meeting in Caliente, Nevada, with BLM personnel and ranchers in the area, several alternative sites were selected to replace those containing areas with grazing allotments that are currently being used. I would strongly urge you to replace the current

proposed solar areas with these other suggested sites that have few, if any, detrimental effects or impacts. Most of these outlined areas contain dry lake beds with little vegetation or surface areas that are not suitable for adequate grazing. These sites also have power transmission lines running adjacent to them, making them more ideal than the present locations.

In closing, I would like to request that you redefine the Dry Lake Valley North area to include only the Ely Springs allotments. I would also like to urge you to consider the alternate sites outlined in the scoping meeting in order to cause the least amount of adverse effects.

Sincerely,

Kenneth Lytle
Permittee in the Dry Lake Valley North proposed solar area