

Thank you for your comment

The comment tracking number that has been assigned to your comment is SolarS50159.

Comment Date: July 11, 2008 17:24:57PM
Solar Energy Development PEIS
Comment ID: SolarS50159

First Name: [Withheld by requestor]
Middle Initial: [Withheld by requestor]
Last Name: [Withheld by requestor]
Organization: Colorado Division of Wildlife
Address: [Withheld by requestor]
Address 2:
Address 3:
City: [Withheld by requestor]
State: [Withheld by requestor]
Zip: [Withheld by requestor]
Country: [Withheld by requestor]
Email: [Withheld by requestor]
Privacy Preference: Withhold name and address from public record
Attachment: Solar PEIS comment letter and map.pdf

Comment Submitted:

see attached scoping comments for the solar PEIS from the Colorado Division of Wildlife. [See Attachment.](#)

STATE OF COLORADO

Bill Ritter, Jr., Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE

AN EQUAL OPPORTUNITY EMPLOYER

Thomas E. Remington, Director
6060 Broadway
Denver, Colorado 80216
Telephone: (303) 297-1192
wildlife.state.co.us



*For Wildlife-
For People*

July 11, 2008

Solar Energy Development Programmatic EIS
Argonne National Laboratory EVS/900
9700 South Cass Avenue
Argonne, IL 60439

RE: Colorado Division of Wildlife Comments on Preliminary Scoping of the Solar Energy Development Environmental Impact Statement

Dear Argonne National Laboratory,

Thank you for considering the Colorado Division of Wildlife (CDOW) preliminary scoping comments on the Solar Energy Development Programmatic Environmental Impact Statement (PEIS) for BLM-administered public lands. CDOW supports implementation of renewable energy resource projects. However, CDOW also recognizes solar development can be a highly intensive use of the land with potential to remove areas of landscape permanently from productivity (i.e., range, agriculture, etc.). Due to this, CDOW would like to be included in scoping an alternative that avoids critical and sensitive wildlife habitats. Private lands in the south central portion of the state may represent more prospective areas for larger scale solar development projects within the State of Colorado.

- *Competing development.* Some of the areas where solar development may be proposed also have significant oil and gas development occurring, potential for oil shale development, and the southeast and northeast portions of the state are also being developed for wind energy. In these locations, BLM should define a protocol for managing these multiple energy development resource demands.
- *Water.* CDOW is also concerned about the withdrawal of water required to maintain dust and debris free solar panels, as many areas within Colorado have limited, over appropriated water resources. Riparian areas and perennial streams should be protected from impacts of construction and equipment maintenance. Operational controls will have to be established to ensure that stormwater runoff does not enter streams.
- *Infrastructure.* The infrastructure necessary to connect new solar projects should be compatible with previous recommendations submitted on the west-wide energy corridors PEIS. Please refer to CDOW's comments on the west-wide energy corridors PEIS, dated February 13, 2008

(or a copy of this letter can be provided upon request from Kim Kaal, CDOW (970) 255-6127 or Kimberly.kaal@state.co.us).

The following is a list of sensitive and unique habitats matched with solar potential (determined from DOIs preliminary scoping map) starting with the high potential areas, and the respective Colorado County. Please also refer to the attached map provided by CDOW. These data can also be provided in electronic format upon request. Some of the listed habitats are so unique that they are effectively irreplaceable. Examples of this habitat include raptor nests, and winter roosts, migration corridors, production areas and sage-grouse leks. In these areas, it would be difficult to install solar panels which are anticipated to cover broad portions of the landscape without impacting sensitive and unique habitats. It is our position that these high priority habitats could not be mitigated for through best management practices and we recommend avoiding them altogether. Some critical winter ranges should be mitigated for onsite if possible, off site mitigation would also likely be necessary.

The following is a list of critical habitat that coincides with BLM-administered public lands and solar development potential areas (generally listed within counties from most to least sensitivity or prevalence):

COLORADO COUNTIES WITH HIGH TO MEDIUM SOLAR POTENTIAL

Archuleta County (high solar potential)

- Elk production areas

Alamosa County (high solar potential)

- Mule deer critical winter range
- Bighorn sheep winter concentration areas
- Elk production areas

Conejos County (high solar potential)

- Bighorn sheep severe winter range/winter concentration areas
- Mule deer critical winter range
- Bald eagle winter roosts
- Pronghorn antelope critical winter range

Custer County (high solar potential)

- Mule deer critical winter range
- Pronghorn antelope critical winter range
- Bighorn sheep critical winter range

La Plata County (high solar potential, also coincident with oil and gas development)

- Elk migration corridor/production areas
- Mule deer critical winter range

Montezuma County (high solar potential, also coincident with oil and gas development)

- Mule deer critical winter range/migration corridor
- Bald eagle nests/winter roosts
- Peregrine falcon active nest

Rio Grande County (high solar potential)

- Mule deer critical winter range
- Elk migration corridor
- Pronghorn antelope critical winter range
- Prairie dog active colonies

Huerfano County (high to medium solar potential, also coincident with wind development activity)

- Elk production areas
- Mexican spotted owl critical habitat
- Bighorn sheep production areas/winter concentration areas
- Peregrine falcon active nest

Montrose County (high to medium solar potential)

- Gunnison sage-grouse production areas/leks (significant portion, most concern for this area)
- Elk migration corridor
- Mule deer critical winter range (medium potential area)
- Pronghorn antelope critical winter range (medium potential area)
- Prairie dog active colonies
- Peregrine falcon active nest
- Townsend's big eared bat roost sites

Saguache County (high to medium solar potential)

- Bighorn sheep production areas/severe winter range/winter concentration areas
- Mule deer critical winter range/migration corridor (high solar potential)
- Elk production areas
- Pronghorn antelope severe winter range/migration corridor
- Gunnison sage-grouse production areas/leks (small amount)
- Prairie dog active colony

San Miguel County (high to medium solar potential)

- Bighorn sheep production areas/critical winter range (medium solar potential area)
- Gunnison sage-grouse production areas/leks
- Elk migration corridor
- Mule deer critical winter range
- Pronghorn antelope critical winter range (medium solar potential)
- Prairie dog active colonies
- Peregrine falcon active nest
- Townsend's big eared bat roost sites

COLORADO COUNTIES WITH MEDIUM TO LOW SOLAR POTENTIAL

Chaffee County (medium solar potential)

- Bighorn sheep severe winter range/production areas/winter concentration areas (most concern for this area)
- Mule deer critical winter range
- Elk production areas/migration corridor
- Townsend's big eared bat roost sites

Fremont County (medium solar potential)

- Bighorn sheep production areas/severe winter range/winter concentration areas
- Mule deer critical winter range
- Elk production areas/migration corridor
- Mexican spotted owl critical habitat
- Pronghorn antelope critical winter range/migration corridors
- Peregrine falcon active nest

Gunnison County (medium solar potential)

- Gunnison sage grouse leks/production area (most concern for this area)
- Mule deer critical winter range
- Bighorn sheep production areas
- Bald eagle active nests/winter roost
- Elk production area

Las Animas County (medium solar potential, also coincident with oil and gas development)

- Mule deer critical winter Range
- Pronghorn antelope critical winter range

Park County (medium solar potential)

- Mule deer critical winter range
- Elk production areas/migration corridor

Teller County (medium solar potential)

- Bighorn Sheep production areas/severe winter range
- Mexican spotted owl critical habitat

Delta County (medium to low solar potential)

- Mule deer critical winter range
- Pronghorn antelope critical winter range
- Bighorn sheep production areas/winter concentration areas
- Bald eagle winter roost
- Prairie dog active colonies

Dolores County (medium to low solar potential)

- Gunnison sage-grouse production areas
- Elk production area/migration corridor
- Mule deer critical winter range
- Bald eagle winter roost
- Peregrine falcon active nest

Garfield County (medium to low solar potential, also coincident with oil and gas development)

- Mule deer critical winter range (large portions, most concern for this area)
- Elk production areas
- Pronghorn antelope critical winter range
- Greater sage-grouse production areas (small amount)

Hinsdale County (medium to low solar potential)

- Bighorn sheep production areas/severe winter range/migration corridor/winter concentration areas (most concern for this area)
- Elk production areas
- Lynx breeding habitat

Kiowa County (medium to low solar potential, also coincident with wind development activity)

- Lesser prairie chicken production areas
- Prairie dog active colonies

Larimer County (medium to low solar potential)

- Elk production areas

Mesa County (medium to low solar potential)

- Mule deer critical winter range
- Bald eagle nests/winter roosts (along the Colorado River)
- Pronghorn antelope critical winter range
- Bighorn sheep production areas

- Peregrine falcon active nest
- Townsend's big eared bat roost site

Moffat County (medium to low solar potential)

- Black footed ferret release areas
- Greater sage-grouse production areas/leks (large portion, most concern for this area)
- Elk production areas/migration corridor
- Pronghorn antelope critical winter range
- Bighorn sheep winter range
- Mule deer critical winter range
- Bald eagle active nests/winter roost
- Columbian sharp-tailed grouse production areas/leks
- Prairie dog active colonies
- Peregrine falcon active nest

Rio Blanco County (medium to low solar potential, also coincident with oil and gas and oil shale development)

- Elk production areas
- Greater sage-grouse production areas/leks (large portion of the area, and most concern for this area)
- Mule deer critical winter range/migration corridor
- Pronghorn antelope critical winter range
- Black footed ferret release area
- Prairie dog active colonies

COLORADO COUNTIES WITH LOW SOLAR POTENTIAL

Eagle County (low solar potential)

- Bighorn sheep winter concentration areas
- Mule deer critical winter range/migration corridor
- Pronghorn antelope critical winter range
- Greater sage-grouse production areas/leks
- Bald eagle winter roosts

Grand County (low solar potential)

- Elk production areas/migration corridor
- Greater sage-grouse production areas/leks
- Mule deer critical winter range/migration corridor
- Pronghorn antelope critical winter range
- Peregrine falcon active nest

Jackson County (low solar potential)

- Greater sage-grouse production areas/leks (most concern for this area)
- Elk production areas
- Mule deer critical winter range
- Prairie dog active colonies

Ouray County (low solar potential)

- Mule deer critical winter range
- Bald eagle winter roosts
- Elk migration corridor/production areas

Pitkin County (low solar potential area)

- Elk production areas
- Mule deer critical winter range

Routt County (low solar potential)

- Elk production areas
- Greater sage-grouse production areas/leks
- Columbian sharp-tailed grouse production areas/leks
- Mule deer critical winter range
- Pronghorn antelope critical winter range

In summary, this list represents some of the major species/critical habitats that may be potentially impacted. Many other species not listed above would also be impacted by broad scale solar development. The acreage of high priority wildlife habitat that is coincident with acreage defined by the Solar Energy Development PEIS is 4,216,475 acres, which is the equivalent of about 24% of all high priority habitat identified in the State of Colorado.

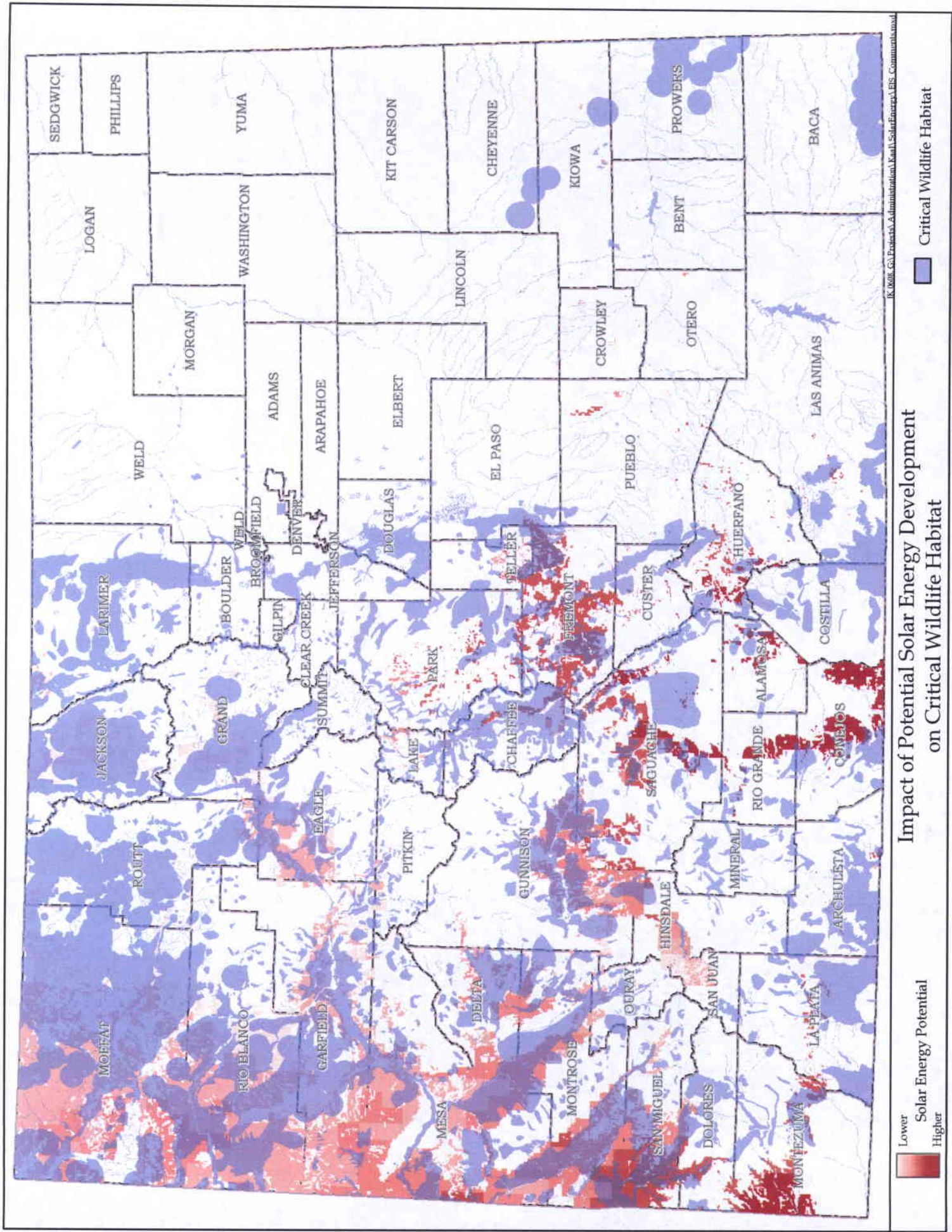
Thank you for considering these comments; we look forward to working together with you to refine the preliminary alternatives and provide more detailed definition of wildlife issues for the Draft and Final PEIS.

Sincerely,

Ron D. Velarde

for Thomas E. Remington
Director

Cc: R. Kahn
M. Konishi
R. Velarde
S. Yamashita
D. Prenzlou
T. Spezze
C. Greenman
A. Trujillo
J. Holst
K. Kaal
B. Petch
J. Broderick
S. Hebein
D. Riggs



Impact of Potential Solar Energy Development on Critical Wildlife Habitat

Lower Solar Energy Potential
Higher

Critical Wildlife Habitat

K:\006 - G:\Projects\Admin\Information\Kearl\SolarEnergy\GIS_Communications.mxd