

United States Senate
WASHINGTON, DC 20510

May 2, 2024

The Honorable Tracy Stone-Manning
Director, Bureau of Land Management
U.S. Department of Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Director Stone-Manning:

We write to express our concerns regarding the Bureau of Land Management's (BLM) intent to evaluate utility-scale solar energy planning and amend resource management plans for renewable energy development – hereafter referred to as the Updated Western Solar Plan.

The Updated Western Solar Plan revises the structure for pre-screening public land for use in solar development. We understand that as demand for electricity continues to grow, there is a need to build more energy production and transmission infrastructure. However, this cannot be done at the complete expense of pre-existing multiple uses.

We have repeatedly learned one-size-fits-all rules do not work for ecologically and geographically diverse western landscapes. Any generic federal action, such as the Updated Western Solar Plan, that causes management to digress from tailored, local strategies could prove detrimental to our energy security, wildfire resilience, resource management, and wildlife habitats.

Due to the configuration and containment of solar infrastructure, solar projects must be carefully scoped so as not to interfere with other established multiple uses. It is critical to consider the opportunity cost of restricting land to an exclusive, singular use. While the scope of the Plan's proposed areas have been tailored to only the most conducive areas for solar, we remain concerned that these are lands that many already stake their livelihoods on through other multiple uses. Some uses, such as grazing, are not just disrupted, but wholly shut out of public land as solar becomes more prevalent.

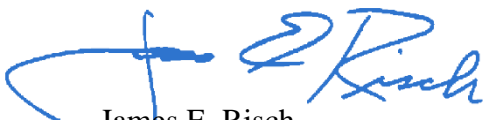
With this in mind, we strongly urge you to provide additional community outreach and listening session opportunities regarding this plan, especially in communities within the 10-mile preferred transmission access zone and lands available for application under the preferred alternative. Additionally, we request you reopen and extend the comment period to allow for more public engagement in affected communities.

Given these concerns, we also request your response to the following questions:

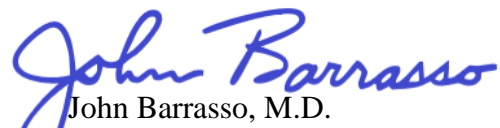
1. Why was the determination made to change the definition of “utility-scale solar” from 20 megawatts, to 5 megawatts?
2. Lands within Solar Energy Zones identified in the 2012 Western Solar Plan were withdrawn from locatable mineral entry for 20 years. Will any of the newly designated land in the Updated Western Solar Plan be similarly withdrawn from mineral production or other productive uses?
3. How will your agency guarantee this rule does not fast-track solar development that may lack local support or provide adequate time for public review? What is the balancing test you intend to use to determine whether public concerns outweigh purported project benefits?
4. Grazing is important to rangeland conservation, and BLM grazing lands are also an important resource for our nation's food chain. Will you guarantee that the Updated Western Solar Plan results in no net loss in grazing on BLM land as measured in Animal Unit Months, and moreover, in the case of any displacement, that permittees are assured equitable allotments in terms of water access, land improvements, and infrastructure?
5. How do you intend to address and offset the displacement of all other multiple uses on land being considered for solar development?

Thank you for your attention to this matter. We look forward to your response.

Sincerely,



James E. Risch
United States Senator



John Barrasso, M.D.
United States Senator



Cynthia M. Lummis
United States Senator



Steve Daines
United States Senator



Michael S. Lee
United States Senator



Mike Crapo
United States Senator