Society for the Conservation of Bighorn Sheep
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On behalf of the Society for the Conservation of Bighorn Sheep, I hope to encourage discussions and the exchange of information regarding the development of solar energy plants, and I applaud the effort put forth by those that organized this forum.

For the record, our organization has grave concerns about any loss of bighorn sheep habitat, or loss of any habitat in general, as well as the impacts of solar energy development. For over 50 years, SCBS has been on the forefront and a leader in restoring our wild places, assuring an intact ecosystem for the whole desert community, through maintaining, enhancing and improving the habitat. Our involvement is a great example of a working relationship (partnership) with State agencies and the private sector. We have been completing ecosystems by enhancement and development, and not destroying habitat. Many desert inhabitants benefit from our systems. More than 206 species of birds, 47 mammals, countless numbers of insects, the whole desert community benefits from a cooperative effort and not just targeting species. We have been on the leading edge of our American Crusade for Wildlife and are proud of our history.

Nevertheless, the future benefits to the human population may outweigh the benefits of a complete and intact ecosystem containing all of its essential components. We feel, however, that a partnership or working relationship with other organizations having similar concerns can help offset some of the negative effects that most assuredly will occur with the loss of areas of critically important habitat for placement of solar energy plants.

The concern for impacts to our environment, accessibility, and sporting opportunities dictates that any such partnership must include representatives from private sector, government agencies, and concerned sportsmen and conservationists, such as those gathered here today. In time, such a partnership could have a positive influence on the rate of habitat loss. Forming a partnership can, and will, benefit all concerned about the immediate and long-term future of wildlife and wildlife habitat. The commitment to the resources and the willingness to improve, enhance, and maintain habitat could provide an unprecedented opportunity to get things right and do them correctly.

Our wish is to have a standard that others may learn from, and the opportunity here today presents itself for that purpose. Let's consider working together collectively for the common good but, particularly, for the good of desert wildlife.

Very important items for which we advocate are the needs for baseline information to be established prior to any construction, intensive monitoring during construction, and follow-up on an ongoing basis during plant operation to assure that there are not undesirable effects that cannot be compensated for during the life of any solar project.

This should include, but in no way be limited to, air and ground surveys of desert bighorn sheep in surrounding mountain ranges, as well as on any specific project site.

Capture work, collaring, and monitoring the movements of a sampling of the local bighorn populations before, during, and after construction and operation is crucial information that State wildlife agencies most assuredly will be in need of for future management and conservation activities. Any such baseline must be established by professionals within those agencies, and with the support of project advocates and the responsible land management agencies.

Because of the high probability of multiple renewable energy sites, it is absolutely essential that a buffer zone around each site be established. Doing so will help maintain connectivity among local populations of bighorn sheep and help to maintain the metapopulation structure typical of desert bighorn sheep. Wildlife corridors are absolutely essential for a healthy and viable population, in part because they result in genetic exchange among populations. Any such buffer zone establishes a guideline or benchmark for any future development and additional loss of habitat, and ensures continuing access for sportsmen.

With potential aquifer depletion resulting from the use of water for construction, operation, or maintenance of renewable energy plants, we are not convinced that there will not be an adverse impact on the surrounding springs and seeps that are so important to resident wildlife. Indeed, the water management and conservation activities that have been necessary to ensure that resource remains available to wildlife, particularly bighorn sheep, mandates that project proponents be responsible for maintaining or enhancing sources of water currently available, and providing some that are not yet available, for use by bighorn sheep and other species.

The Society for the Conservation of Bighorn Sheep further urges development of an agreement or a memorandum of understanding to include all government agencies in order to assure that habitat improvements can and will take place in and around lands controlled by those authorities. Habitat work such as water developments, replacement water sources, expanded distribution of water, and enhancement of existing springs will help offset the negative impact of solar projects. This is a very important issue, something that we feel strongly about, and an issue that must be addressed from the beginning.

As the agency primarily responsible for the majority of lands on which solar projects will be built, the Bureau of Land Management must acknowledge that impacts that occur to wildlife habitat outside of designated wilderness areas have potentially devastating implications for wildlife that occupy those wilderness areas. In short, wildlife conservation activities within wilderness areas must be elevated to the same level of importance that of the primitive experiences that can occur within such areas.

Indeed, it is essential that the Bureau and other agencies recognize that mitigation for impacts outside of wilderness will increasingly be met only by mitigation, including habitat enhancement projects, that is implemented within wilderness areas. Those land management agencies must move away from the notion that such features are not compatible with wilderness management, and acknowledge that wildlife conservation is one of the several objectives of, and consistent with, the 1964 Wilderness Act. Passage of the California Desert Protection Act in 1994, which established more than 70 such areas in the deserts of southeastern California, has further complicated efforts to mitigate for impacts to bighorn sheep, including those associated with development of solar energy plants.

It is also imperative that access through or around current and future impacted sites by maintained for both conservation and recreational purposes, and that these access issues be addressed and provided for prior to approval of the construction of any renewable energy facilities on lands administered by the federal government.

We also believe that affected areas must be decommissioned and revert back to natural habitat upon the sunset, or end of viability, of any development approved for solar projects, and that a reclamation plan be full and complete, not unlike mining companies are obliged to do following the useful life of a mine. Doing so will offset speculators and future developments that may radiate from such sites, and if all parties have an understanding that any site on which solar projects are constructed will revert to previous conditions, all concerned will become better stewards of the project site and surrounding areas in order to ensure a successful transition.

Many potential project sites have been selected because of the already existing infrastructure that makes such development feasible, including the presence of freeways, power lines, or railroads; in the absence of such infrastructure, most energy projects would not be economically viable. Such features adjacent to many potential alternative energy sites already have resulted in a loss of connectivity between bighorn sheep occupying mountainous areas adjacent to proposed project sites. Although proponents of solar energy development were not responsible for the fragmentation that has occurred to date, it is in the best interest of conservation, public relations, and the long-term viability of populations of bighorn sheep to contribute generously to efforts to ensure that connectivity between subpopulations is enhanced. This is best addressed by establishing additional water sources, in concert with translocations of bighorn sheep, both of which will decrease the impacts of habitat fragmentation associated with existing infrastructure, and which only will be exacerbated by additional destruction of habitat associated with development of alternative energy sites.

There will be some loss of habitat with every project, regardless of whether or not project biologists viewed the area as currently used by bighorn sheep, or viewed it as being of minimal or no importance to that species. That alone dictates that mitigation is important and must be implemented. Proponents of solar energy should be anxious to contribute to the long-term conservation of bighorn sheep, regardless of the fact that they played little role in the construction of existing infrastructure that makes such projects economically feasible.

For such mitigation to be successful, it is essential that the Bureau of Land Management, or other appropriate agency, recognize that projects impacting areas outside of wilderness are sometimes best mitigated by altering the status quo within wilderness. Indeed, few, if any, ecological considerations went into the creation of the majority of designated wilderness in the deserts of the southwestern United States, and particularly those designated by the California Desert Protection Act of 1994. Now is the time for the land management agencies to recognize this, and acknowledge that mitigation within those areas is appropriate and necessary to ensure that wildlife conservation goals are achieved and that the viability of populations of large mammals in those areas is ensured.

The health and well-being of the large vertebrates occupying desert areas has been negatively influenced by fragmentation, and with some vision and cooperation among proponents of solar development, land management agencies, state wildlife agencies, and concerned sportsmen and other conservationists, the future effects of continued fragmentation may be offset. Humans are in the process of further fragmenting the remaining fragments of what once was a broad, intact ecosystem, and this could well be the death knell for several species. But there is a simple fix that could be shared by a multitude of interested parties. Indeed, agencies, and all of those concerned with the conservation of wildlife and, in particular, bighorn sheep, should work together to minimize further fragmentation of habitat, and mitigate for the additional fragmentation that will occur as a result of solar development.

These are some of our concerns, and the Society for the Conservation of Bighorn Sheep desires to be a part of the fix, and not a part of the problem. Formulating a coalition of like-minded conservation organizations and individuals that have a proven track record in regard to wildlife and its habitat will help address the impacts of solar projects, as well as other alternative energy projects. Clearly, this forum provides an opportunity to form partnerships that will truly be beneficial for all concerned, but particularly for bighorn sheep.

Any success will, however, be contingent upon cooperation from the appropriate land management agencies and those individuals and organizations that, until now, have failed to acknowledge that human intervention within wilderness areas will be necessary to

ensure that viable populations of large mammals continue to exist across the landscape -- a landscape that is being further fragmented by human activities, all of which have enormous implications for the populations of bighorn sheep and other large mammals inhabiting the deserts of the American southwest, both within and outside of those wilderness areas.

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SPORTSMEN FOR
Responsible Energy Development

SPORTSMEN SPEAK ON SOLAR

Forum on Solar Energy Development on Federal Public Lands

November 29-30, 2011
Green Valley Ranch Resort & Spa
2300 Paseo Verde Parkway, Henderson, NV 89052

Join Sportsmen for Responsible Energy Development for the Sportsmen Speak on Solar forum in late November at the Green Valley Ranch Resort & Spa just outside of Las Vegas. This event will provide a venue for local and national sportsmen-conservation organizations, state fish and wildlife agencies, and federal land management agencies to discuss the current planning process for siting solar facilities on federal public lands and opportunities for working together as the plans move forward. The three main goals for the forum are:

1. Raise awareness for sportsmen's issues when considering solar development.
2. Create a broader network of individuals aware of and engaged in solar siting to ensure that sportsmen's input is considered.
3. Provide direct input for comments on the Department of Interior's recently released supplement to the Draft Programmatic Environmental Impact Statement on Solar Energy Development

While the forum itself will take place on Wednesday November 30, we are organizing a site visit to two solar facilities on the morning of November 29 followed by a sporting clays shoot that afternoon. Please plan on getting to town on Monday November 28 if you would like to participate in these field trips.

Travel Planning
The host hotel is the Green Valley Ranch Resort & Spa, just 5 miles from Las Vegas' McCarran International Airport. The hotel has a shuttle that runs every two hours starting at 7:30 am until 9:30 pm with pick up from the zero level of the airport. Taxi fares are also reasonable between the airport and the hotel.

We have established a room block for meeting attendees and will be able to support some travel costs for individual sportsmen to attend. Please contact Jodi Stemler at 303-955-5832 or jodi@stemlerconsulting.com to discuss your hotel and travel needs and to secure a room. **We need to send a rooming list to the hotel by November 11, so please respond as soon as possible!**