To whom it may concern:

Thank you for the opportunity to provide some insight and suggestions for the Solar Energy Development Programmatic EIS. As a non-advocacy, science-based organization, we support thoughtful development of our resources to support a growing demand for renewable energy. This involves being aware of the repercussions of development on our shared wildlife resources. We appreciate the time and resources that went into preparing this document and feel that it offers a strong basis on which we can responsibly develop renewable energy on public lands.

We firmly support the SEZ-only development strategy proposed in the EIS, with prioritizing development near areas that are already disturbed or developed and close to existing transmission infrastructure. We feel that this type of directed development will allow for necessary renewable energy projects while reducing overall impacts on the environment.

Additionally, the authors of the PEIS did a satisfactory job of including wildlife-related issues in considering the development zones, with providing adequate reference to considerations that should be given to species that occur near the zones. We acknowledge the references to raptors and their habitat in Chapter 4, including the emphasis placed on diurnal raptors. We wish to provide some feedback about considerations for an individual species that might be impacted from development that was not specifically addressed in the document, namely Burrowing Owls.

Burrowing owls are small owls that are highly terrestrial and nest in burrows underground. They are of particular concern with respect to SEZ development since solar construction involves scraping up to 80% of the vegetation from the surface, thereby creating a significant ground disturbance for any Burrowing Owls in the area. Burrowing owls have varying levels of conservation concern throughout its range, as they are a species of concern in several western states (including California and Utah) state endangered in Colorado and protected under the Migratory Bird Treaty Act at the federal level. We encourage more consideration to be given to these terrestrial birds, given their conservation status throughout the range of SEZ development.

HawkWatch International (HWI) is a 501(c)3 non-profit science-based raptor conservation organization. We thank you for the opportunity to share our insights and support for the PEIS.

Sincerely,

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