

Thank you for your comment, Kena Gloeckner.

The comment tracking number that has been assigned to your comment is SolarM60190.

Comment Date: September 13, 2009 09:30:10AM
Solar Energy Development PEIS
Comment ID: SolarM60190

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Attachment: solar comment letter.doc

Comment Submitted:

To Whom It May Concern:
Please see attachment for my comments.
Kena L. Gloeckner

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:

I am a permittee in the Dry Lake Valley North Solar Energy Study Area in which 49,775 acres have been outlined to be included in you PEIS. My family has been involved in the cattle ranching business for over 150 years, and our ownership and use of water and grazing rights in the majority of this particular area exceed 100 years. Our allotment is one of the best grazeable areas in all of Dry Lake Valley. In our operation, this location with its abundant white sage (winter fat) and moderate temperatures serves as the primary locale for the winter grazing and early spring calving of our cattle; most importantly, it is essential to the existence of our operation. Without this area, our livelihood would be destroyed. Not only would this area affect us, it also is crucial for the livelihood of several of our neighboring ranchers. In fact, more than 10,000 AUMs (animal units per month) would be lost in Dry Lake Valley North if this area were approved for solar construction. Even more detrimental is the fact that the thousands of summer AUMs belonging to these ranchers would also prove to be useless since it would be economically and physically unfeasible to feed these large numbers of cattle during the six months (November through April) that they normally spend in Dry Lake Valley. The summer and winter AUMs balance each other as two essential parts to the whole ranching operations.

Not only do we ranchers have grazing allotments in this area, but we also own the vested water rights for the springs that service this valley. Currently, the ranchers in our allotment have a pipeline network (over 31 miles long) that transports water to 5 reservoirs, in addition to 2 wells located at reservoirs within the proposed area. If this area were approved for solar, we would lose both accessibility and serviceability to our waters. Additionally, these reservoirs provide water for the wild horse, deer, and antelope herds in the valley. The ensuing consequences for affecting these vested water rights could prove to be drastic. Again, not only would these particular water rights be affected since the ranchers could show no beneficial use by cattle, the water rights (which are extremely numerous) in the summer ranges would also be detrimentally affected without the cattle herds to show usage.

Upon closer inspection, I believe a solar expert would discover that much of this area is unsuitable for solar facilities. In the area there is found a very finely divided soil composed of dust blown by the wind and silt deposited by water. After any disturbance of the surface crust, it easily becomes airborne again. The area is prone to many dust storms, and this soil type becomes even more troublesome whenever it is disturbed by travel.

Often times during the fall and spring, the powdery levels reach almost six to eight inches on many of the roads. Wind often carries the material throughout the valley, and it is not uncommon for one to see numerous whirlwinds throughout the valley.

Finally, if this area were to be selected, great economical and environmental adversities could occur. Lincoln County is an economically depressed area, and the ranching industry is a vital element to the economy since it represents one of the main commercial activities in the area. If chosen, this proposed area would be detrimental to some of the biggest ranches in Lincoln County, forcing them out of business and causing a drop in revenue to businesses from which they purchase feed supplements, veterinarian supplies, equipment, fencing materials, and other ranching necessities. The domino effect would be extensive. Along with the economical effects would come the environmental consequences. For over a hundred years, the ranchers have been excellent stewards of the land because it, in essence, is their livelihood. The loss of the native white sage in this area as a result of solar construction would be irreplaceable since this particular plant is difficult to reintroduce. Once the white sage is gone, it is gone. Since this area does not receive substantial amounts of precipitation, disturbance to the native vegetation would greatly impact rangeland health.

It is my understanding that the Lincoln County Commission supported a proposed solar study area within the Ely Springs Cattle Grazing Allotment since its owner, Vidler Water, had asked to become involved in this project. It is my request that the Dry Lake Valley North study area be redefined to include only this portion since it would have minimal adverse effects to all involved.

Your careful consideration of the concerns expressed in this letter would be greatly appreciated.

Sincerely,

Kena Gloeckner

Permittee in the Dry Lake Valley North Purposed Solar Energy Study Area