



June 16, 2026

Commissioner Robyn Sahid  
Arizona State Land Department  
1616 West Adams Street  
Phoenix, Arizona 85007

Treasurer Kimberly Yee  
Arizona State Treasurer  
1700 West Washington Street  
Phoenix, Arizona 85007

**Re: Proposed Solar Development on Arizona State Trust Lands**

Dear Commissioner Sahid and Treasurer Yee:

On behalf of the America First Policy Institute (AFPI), thank you for the recent statement from the Arizona State Land Department (ASLD) regarding the Ørsted project that would transform active grazing allotments on State Trust Land into a utility-scale solar installation. It is imperative that projects such as this are evaluated objectively, particularly in the wake of [reporting on potential conflicts of interest](#) on the part of elected officials.

AFPI is a nonpartisan, nonprofit research institute whose energy policy work aims to promote reliable, affordable, abundant, and secure energy for America. Our agriculture policy work aims to protect America's farmers, ranchers, food supply, and rural economies.

While it is feasible to rely on state lands to produce energy efficiently and reliably, the Ørsted project cannot ensure long-term energy reliability for Arizonans. Our [research is clear](#): solar and wind installations raise electricity production costs and reduce grid reliability. Additionally, the proposed Ørsted facility would compound these problems by transforming active grazing areas, rendering them unusable for current or future ranching, depriving agricultural producers of their livelihoods, threatening the US food supply, and devaluing the real assets of the Trust.

To mitigate against these realities, a delicate and elaborate set of considerations must be made before any state land use projects should be approved. Specifically, the ASLD should require developers to present the following information:



- Developers should be required to provide an assessment of a proposed project's long-term efficacy in energy supply creation, the impact upon the reliability of the electric grid in Arizona, and the impact upon the ratepayer costs that may result from a proposed project. In this case, a full accounting of those costs should go beyond simple LCOE or 2025 LCOE+ calculations and include the cost to build the project, the costs to connect this facility to the state's grid, and the impacts of additional solar resources, including overbuilding and curtailment necessary to address solar's known intermittency issues.
- In line with ASLD's charge to "responsibly manage the assets of a perpetual trust", ASLD should work to prevent land degradation from devaluing those. To that end, prospective developers should be required to present a decommissioning plan for proposed projects and submit a bond to ensure the land is restored after the proposed industrial facility is removed from trust land. If removal and remediation are not possible or planned, project proponents should make this clear and explain why.
- A full grazing-impact analysis should be presented detailing how a proposed project will affect ranchers' ability to graze their animals on trust land, and the impacts of restricted access to grazing lands on the economic viability of those ranching operations. It should be made clear that simply asking ranchers to move their animals to another location is not a feasible solution in that it would require ranchers to purchase new land and incur extraordinary costs.
- An analysis should be made of a proposed project's impact on the soil, water, and rangeland restoration efforts after the project is removed from trust land. Specific attention should be given to the potential for glass and metal shards, leachate from damaged solar panels, and the remediation plans necessary to address these issues.
- Prospective developers should be required to provide full disclosure regarding any subsidies that are required to finance a proposed project, and the project's viability should such subsidies not be available.
- Developers should disclose the supply chain for the solar panels to be used in a proposed project. Depending on the supply chain of proposed solar panels, a proposed project may expose trust land to significant long-term risks.



- For example, can the developer confirm that the solar panels and components are produced without slave or child labor and that they use conflict-free minerals and metals?
- Prospective developers should be required to show that evicting long-term grazing leaseholders and transitioning the land to solar is the best alternative when other areas, such as disturbed lands, brownfields, or mining lands, could be used.
- ASLD should solicit feedback from grazing lessees and other individuals and organizations that may be affected by proposed projects that impact the use of trust land.

Ultimately, the sacrifice of state trust lands, currently and historically used for agricultural operations, should be considered only in exchange for a greater return to all Arizonans, and never for the benefit of foreign companies seeking US federal government subsidies. Indeed, short-term revenue for the state trust cannot justify destroying current and future productive agricultural use of the land. Ranching and farming are key economic interests in Arizona that should be protected.

For these reasons, AFPI respectfully urges ASLD to deny the Ørsted project and only approve other potential projects where a prospective developer can show that the proposed project will be economically sound without the benefit of government subsidies, will be protective of productive agricultural land and Arizona's future ability to maintain successful farming and ranching operations, and will result in long-term, reliable energy creation. Solar and wind installations simply cannot meet this threshold.

Thank you for your consideration. AFPI stands ready to assist ASLD in any way necessary.

Sincerely,

*Leigh Ann O'Neill*

Leigh Ann O'Neill  
Chief Legal Affairs Officer  
America First Policy Institute

*Jason Hayes*

Jason Hayes  
Director, Energy and Environment  
America First Policy Institute