United States Department of the Interior
U.S. Fish & Wildlife Service

Hanford Reach National Monument
Saddle Mountain National Wildlife Refuge
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Mr. Tom Osborn
Bonneville Power Administration
911 N.E. 11th Avenue
Portland, OR 97212

SUBJECT: Comments on Maiden Wind Farm Draft Environmental Impact Statement (EIS), DOE/EIS-0333

Dear Mr. Osborn:

The Hanford Reach National Monument/Saddle Mountain National Wildlife Refuge (Monument) is nationally recognized for it's natural and cultural resources and vast landscapes. The area is a haven for important and increasingly scarce objects of natural and historic interest. Bisected by the free-flowing Hanford Reach of the Columbia River, the monument contains the largest remnant of the shrub-steppe ecosystem that once blanketed the Columbia River Basin. The proposed Maiden Wind Farm project is located immediately adjacent to the Monument's Fitzner-Eberhardt Arid Lands Ecology Reserve (ALE) Unit, and currently, much of ALE is considered within the effected area of the project. This project may potentially affect the ability of the management of the Monument/Refuge to protect the objects of natural and historic interest preserved within the Monument. Please consider the following comments during the preparation of your final Environmental Impact Statement (EIS).

1. The majority of the issues related to construction that are of concern to the Hanford Reach National Monument will be addressed in the proposed "Site Management Plan (SMP)". The Monument would like the opportunity to comment on the SMP and the Noxious Weed Control Plan.

2. **Section 3.2.3.3, 3.2.4.2:** The Recreation Affected Environment and Impacts section of the draft EIS provide an incomplete characterization of the ALE. The Department of Energy historically administered the ALE as an area closed to public uses with the exception of approved research, Native American traditional uses, and environmental education purposes. The administrative transfer of the ALE to the Service in 1997, and designation of the area as a National Monument in 2000, signals a blossoming change in management direction from the past era of secrecy and defense security. Currently the Service maintains historical management of the ALE while preparing to initiate a Comprehensive Conservation Plan and Environmental Impact Statement for the Monument. The CCP/EIS will consider a range of public uses that may take place across the Monument. Preliminary issue scoping for the CCP/EIS indicates a strong interest from the Hanford Reach Federal Advisory Committee and other stakeholders in continuing to manage the ALE as a Research Natural Area, with increased opportunities for environmental education. Thus, while this area now receives limited public use which is focused on environmental education, it is reasonable to expect that in the future, these uses may be expanded at this new National Monument. The spectacular vistas afforded from the Rattlesnake Mountain crest are regionally unique, and the viewshed from the Rattlesnake crest would be significantly impacted by the proposed project.

3. **Section 3.3.4 Impacts of the Proposed Action, Noxious Weeds:** The text indicates several negative impacts from non-native plant invasion through a bulleted list. It should also be indicated that non-native plants may also cause changes in fire frequency and intensity. This should be added to the bulleted list of negative impacts.

4. **Section 3.4.3.1 Special Status Species:** Pygmy Rabbit have historically occurred on the National Monument. The Monument may be critical in the recovery and re-introduction of this species.

5. **Section 3.4.3.3 Bats:** Field surveys for bats should be conducted prior to construction. A minimum of two years of post-construction bat surveys and mortality documentation should be conducted to evaluate impacts.

6. **Section 3.4.4.3 Operation Impacts, Mitigation:** Post-construction study of impacts to Ferruginous hawks should be conducted. Potential impacts to Ferruginous hawks nesting on the Hanford Reach National Monument are of concern. We suggest further study using radio-telemetry to examine impacts and potential displacement of nesting Ferruginous hawks post-construction. Study specific to Ferruginous hawks would be in addition to post-construction monitoring of general avian impacts.

   The construction of the wind power facility in this area, combined with the construction of the Bonneville Power Administration, Shultz-Hanford Transmission line may impact the ability of Sage Grouse to naturally expand from the Department of Defense, Yakima Training Center (YTC) to the Hanford Reach National Monument. These facilities restrict the area of connectivity between the YTC and the Monument. Post-construction study of sage grouse use in the area should be conducted to determine if these facilities are preventing the grouse from using the Monument area. Alternatively, focused attention to mitigation/enhancement of habitat conditions in the interstitial areas between the Monument and YTC should be conducted to facilitate grouse expansion.

   One year of post-construction monitoring is inadequate to assess impacts. A minimum of two years of monitoring and mortality documentation should be conducted to account for inter-annual variation. Each year the potential impacts to birds and bats could be affected by climate, weather conditions, and other factors.

7. **Section 3.5.3, Visual Resources:** The regionally unique landscape views afforded from the Hanford Reach National Monument's Rattlesnake Mountain crest are not addressed in the draft EIS. Please see comments on Section 3.2.3.3, 3.2.4.2 above. The draft EIS should include an evaluation and simulation of visual impacts from observation points along the Rattlesnake Mountain crest.

8. **Section 3.17.3:** The estimated 1425 bird strike mortalities would be ***in addition*** to any other anthropogenic causes of mortality. The argument that other causes, such as collision with communications towers, vehicles, building, etc., would cause higher mortality than those caused by the wind turbines, makes no sense, because the other sources of mortality would still exist, and the wind turbines add to those existing mortalities. This is essentially 1425 mortalities that would not have otherwise occurred. This does significantly contribute to the large number of avian mortalities that are caused by all anthropogenic sources in the area.

9. **Cultural Resources:** Because the Cultural Resource (CR) technical report was either not completed or not attached, little specific data other than a list of "features" and "isolates" is included in the draft EIS and it is very non-descript information. What is the connection of these features? How many of these are sites? The very first step in a cultural resource survey is to locate, record and evaluate the cultural resources within a project. It is difficult to ascertain from this document whether this step has been done. The comment that the resources recorded ".....will be formally recorded as archaeological "sites" or "isolates" as appropriate...." suggests that additional work may be in process but still is incomplete or not included here.

   We recognize that locational information is withheld purposely but other details such as site, or perhaps in this case "feature", size, characteristic (rock cairns being historic, prehistoric, hunting blinds, burials etc) relationship to the Area of Potential Effect (APE) and so on is absent. More importantly, there is no site evaluation for National Register of Historic Places significance, perhaps because the actual "sites" are still unknown. This is the critical determination to be made in order to complete an appropriate environmental document. The impacts of the project are directly linked to the eligibility of the sites. i.e. sites eligible for the National Register are the "historic properties" to be considered under 36 CFR 800 guidelines.

   The information presented under 3.6 Cultural Resources is rather confusing and disjointed. The chapter lacks necessary information and cohesion of what is presented. The regional background under 3.6.3.1 is sparse and relatively generic with the exception of the Anderson Ranch. This discussion on the other hand, is good background information but seems out of place where it was inserted. Relating it to the project in the beginning, as is done briefly in the third paragraph of page 3-77, would be more helpful.

   The Impacts section 3.64 is premature without the site details as mentioned. The comment regarding " .... any impact to cultural resources is considered a high impact." is inappropriate and does not follow the 36 CFR 800 guidelines for the CR compliance procedures. The rest of the paragraph merely cites language from the regulation and tells us nothing about the CR in this project. The involvement of the Tribes and other Native American groups is commendable but I hope the text regarding the traditional cultural properties has been authorized by the appropriate tribal entities.

   The heading "Mitigation" is confusing as it has no section number. We assume it only references the mitigation for construction. However, the next two subheadings 3.6.4.3 and .4 incorporate mitigation within them. The idea of the cultural resource mitigation monitoring plan is useful but seems to be a larger scope, agency CR management type plan that would take time to develop. Certainly many of the specifics for inadvertent discovery, points of contact etc. could be written into the construction contracts without having what sounds like a formal "plan" being adopted.

Thank you for carefully considering these issues in your plans for the development of the Maiden Wind Project. If you have questions we would be happy to meet with you to discuss our concerns in greater detail. I can be reached at (509) 371-1801.

Sincerely,

Gregory M. Hughes
Project Leader

cc:
Kevin Clarke, DOE
Mark Miller, USFWS
Don Voros, USFWS
Dana Ward, DOE