Response for Document 80061

80061-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80062

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 2:08 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80062

Wind_comments_80062.doc (45 KB...

Thank you for your comment, Tim Ballard.

The comment tracking number that has been assigned to your comment is 80062. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 02:07:29PM CDT

Wind Energy EIS Draft Comment: 80062

First Name: Tim
Last Name: Ballard
Organization: Umpqua Watersheds Inc.
Address: P.O. Box 101
City: Roseburg
State: OR
Zip: 97470
Country: USA
Privacy Preference: Don't withhold name or address from public record
Attachment: /G4 HD/data files/NEPA writing/BLM general and poc/Wind EIS comments/Wind comments.doc

Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.

December 9, 2004

Dear BLM,

Please accept the following comments from Umpqua Watersheds Inc. We are a conservation organization representing over 500 members, whose primary focus is protecting and restoring the public lands of the Umpqua Basin watersheds in Southwest Oregon. In many respects, wind energy is commendable, and preferable to fossil fuel energy, but development must be considered very carefully, as it is not without serious environmental impacts. Our main concerns are:

1. Roadless areas: Unroaded areas greater than 1,000 acres – whether they have been officially inventoried or not – provide valuable natural resource attributes that must be protected. Please consider each of the roadless area characteristics identified in 36 CFR 294.116 including:

- High quality or undisturbed soil, water, and air;
- Sources of public drinking water
- Diversity of plant and animal communities
- Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
- Natural appearing landscapes with high scenic quality;
- Other locally identified unique characteristics.

80062-1

2. Special Areas: Please exclude special areas from wind development. In Oregon these places include but are not limited to: Steens Mtn, Hart Mtn, Abert Rim, Blue/Wallowa Mtns, all designated wilderness areas, wilderness study areas, Coast Range ridge tops, >1,000 acre roadless areas.

80062-2

3. Bird Mortality: Wind farms are a well-known cause of bird mortality, especially for raptors. Please fully disclose impacts to birds on a species-specific basis, with special emphasis on raptors, migratory birds, and other species of conservation concern.

- Please do not allow wind development in bird migration corridors.
- Areas of low visibility such as the foggy south coast of Oregon should also be avoided.
- Areas where prey species occur should also be avoided to prevent attracting birds of prey into turbine danger zones.

80062-3

- Sage grouse habitat must be avoided, because they avoid areas with trees and other large vertical structures.
- Fence building should be avoided because they can harm other wildlife.

Given that many bird fatalities occur during inclement weather (DEIS p 5-61), places such as the Oregon Coastal region, the Columbia River Gorge, and mountainous regions such as Steens Mtn, where wind is often mixed with clouds and rain should be excluded from wind farm consideration. Another way to minimize raptor collisions is to locate wind farms away from sites with abundant raptor prey, such as meadows and rock formations located on or near ridge-tops. 80062-3 (cont.)

4. **Tower Lighting**: Lights are thought to be an attractant to migratory birds, causing increased mortality. The EIS should consider shorter towers that do not require FAA. 80062-4

5. **Invasive Weeds**: Construction, roads, and power line right-of-ways will all cause extensive ground disturbance and act as a vector for invasive plant species. Weeds are becoming one of the biggest environmental problems of the future. Since wind farms will be located on windy sites, weeds that are wind-dispersed may become a serious problem. 80062-5

6. **Service Roads**: Roads constructed and maintained to facilitate wind energy development will cause serious adverse impacts including:

- Increased surface flows and peak storm flows;
- Habitat and wildlife will be disturbed and displaced; 80062-6
- In SW Oregon a root disease (Phytophthora lateralis) fatal to rare and endemic Port Orford Cedar trees is a serious problem. It is known to be spread by vehicles.

7. **Scenic Impacts**: Ridge top locations are often visible for many miles. Scenic impairment as observed from roadless, wilderness and recreation areas and scenic highways are of special concern. 80062-7

8.**Transmission Corridors**: Construction of transmission corridors necessary to connect wind farms to the existing grid will exacerbate all of the above effects and must be considered as a cumulative impact of wind farms. 80062-8

Your consideration is appreciated.

Tim Ballard
Umpqua Watersheds Inc.

P.O. Box 101
Roseburg, OR 97470

Responses for Document 80062

80062-001: A number of the BMPs, existing mitigation guidance, and mitigation measures identified or discussed in the PEIS address the natural resource attributes that would be encountered within the roadless areas (see Sections 2.2.3 and 3.6 and the mitigation measures presented in Chapter 5). Site-specific analyses of roadless areas will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Such site-specific analyses are beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

80062-002: Exclusions of any additional areas from wind energy development will be determined at the project level as part of the site-specific analyses or through local land use planning efforts, with opportunities for full public involvement. As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including the development of an appropriate monitoring program, will be conducted for any proposed project on BLM-administered lands. The scope and approach for site-specific analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific stipulations for incorporation into the POD. Site-specific analyses are beyond the scope of the PEIS.

80062-003: A species-by-species account would not be practicable nor is it necessary. The PEIS presents bird mortality numbers and estimates that have been reported by others. This information is presented in a manner to indicate that avian mortality does occur at wind facilities. The PEIS does discuss impacts to raptors, a group that has been shown to be susceptible to impacts from wind facilities at some locations.

The Wind Energy Development Program proposed policies and BMPs identify a number of siting considerations (such as the avoidance of landscape features that are attractive to raptors) for incorporation into the POD for any wind energy project proposed for BLM-administered lands. As required by these policies and BMPs, site- and species-specific analyses will be conducted for any proposed project on BLM-administered lands. The scope and approach for species-specific analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific design, siting, and monitoring stipulations for incorporation into the POD. The identification of site- and species-specific analyses is beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

80062-004: The intent of the BLM is to not place restrictions on development based on design features in this PEIS. Design criteria will be evaluated at the project level.

80062-005: The Wind Energy Development Program BMPs include the requirement that wind energy project operators develop plans to control noxious weed and invasive species in areas with new surface disturbance activities. Specific plans will be developed on a project-specific basis for all proposed wind energy projects on BLM- administered lands. Site-specific noxious weed and invasive species control plans are beyond the scope of the PEIS.

80062-006: As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses will be conducted for any proposed project on BLM-administered lands. The scope and approach for site-specific analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific stipulations for incorporation into the POD. Site-specific analyses are beyond the scope of the PEIS.

80062-007: Such concerns would be addressed during site-specific evaluations, determined through input from other federal, state, and local agencies, and interested stakeholders.

80062-008: Section 6.4.3 acknowledges that wind energy development on BLM-administered lands may require the construction of new transmission lines. Such construction would constitute a separate but related activity and would require interagency cooperation and multidisciplinary environmental reviews. The designation of new transmission corridors on BLM-administered lands will occur as a result of interagency consultations, not as a result of a unilateral decision by the BLM. Any such designations would be evaluated through either regional or local land use planning efforts, with opportunities for full public involvement. The potential impacts of transmission system interconnects or expansions that would be required by an individual wind energy project on BLM-administered lands will be assessed as part of the site-specific analyses with input from other federal, state, and local agencies, and interested stakeholders.

Document 80063

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 2:56 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80063

Thank you for your comment, Mike Denny.

The comment tracking number that has been assigned to your comment is 80063. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 02:56:02PM CDT

Wind Energy EIS Draft Comment: 80063

First Name: Mike
Middle Initial: E
Last Name: Denny
Organization: Blue Mountain Audubon
Address: #####
City: #####
State: ##
Zip: #####
Country: USA
Privacy Preference: Withhold address only from public record

Comment Submitted:
The Blue Mountain Audubon has been deeply involved in the wind industry since 1998.These are our comments resulting from our years of experiance with this industry. We are a Pro-wind chapter of the National Audubon Society, however in order to support any wind project we get involved from the planning phase right up through the placement phase and then through the mortality monitoring and are members of the projects TAC group for the life of the project.

1. Placement of individual turbines is everything! Poor placement of just 2-3 turbines can result in very high Bird and Bat mortality on any one project. Therefore we urge the BLM to require pre-construction monitoring of birds and bats (18 months minimum) on proposed turbine sites, not around the edge of the project area, but on exact sites of lead turbines. there should be at least 5 ten min. surveys from each selected point each season. Also require nocturnal migration monitoring for every proposed site with a minimum of two seasons. 80063-1

2. Cumulative impacts to migrating and resident Federaly protected species are the huge growing concern with these wind projects. So the more that is known and understood about bird and bat movements concerning each proposed site the better the BLM will be at minimizing these losses. 80063-2

3. There must be ongoing wildlife monitoring throughout the life of each wind project. We push for two seasons of work every 4-5 years throughout the projected life of the project. This would include mortality monitoring and diurnal point counts from within the wind project. 80063-3

4. The BLM would bennifit greatly by forming a TAC (Technical Advisory Committee) group for each project built on federal lands. This group must enclude voting and alternate members. These folks should be there to represent a broad range of interests from the general public as well as wildlife professionals, hikers, campers,the Wind Developer and BLM & USF&W folks. This group should meet quarterly for the first two years of the wind project and yearly there after. The purpose of this group is to recieve the wildlife reports from the wind developer and to make suggestions where red flags pop up over 80063-4

mortality issues. There must be the option of turbine removal should individual turbines create too many dead bats and birds. 80063-4 (cont.)

5. There must be TFZ zones
(TURBINE Free Zones)on public lands. These would be areas that contain sensitive biological sites or cultral sites. These should be clearly marked on maps and their entrance non-negoable for the wind industry. Areas of high raptor use, rare reptiles, plants or sites of major neo-tropical bird migration must be set aside and placed in TFZs. Not every ridge is ok for turbines regardless of its wind resources. 80063-5

6. These wind turbine projects should use underground connecting transmission cables between turbines and collector stations. ELECTRICAL SUBSTATIONS should be placed so that their overhead transmission cables create little if any mortality to birds. Trenching should be completely avoided across seasonal lithosol pools and stream courses as this will puncture the lenses and distroy these features in water starved areas. The loss of seasonal lithosol pools could greatly impact local amphibian populations. 80063-6

7. The placement of TUBULAR Met Towers WITHOUT guy lines is very important. 80063-7

8. There should not be any Wind Turbines placed right at the edge of a ridge or in the saddles of ridges. Push for a minimum of 300' away from the absolute edge of a ridge. Always keep in mind cumulative impact to birds and how to reduce it on every project. 80063-8

9. There are three sites in Southeastern Oregon that must be off limits (TFZs) these are.....
The Oregon Canyon/Trout Creek Mountains, Pueblo Mountains and the Steens Mountain. These sites are areas of great beauty and biological diversity and wind turbines would forever distroy the unique atomosphere these sites bring to the Great Basin. 80063-9

10. Roads and weeds are a major problem on all wind farms. Please push for strict weed controls and limit roads open to the public on these projects to reduce impacts to wildlife by poachers, road kills ect. 80063-10

11. Require a wind employee wildlife mortality collection protocal. This is a system that requires maintanance employees to give notice when they discover dead birds and bats on wind farm projects.They must bag and tag them and report them to the BLM. 80063-11

12. We are concerned about Wind Projects on public lands as we have observed the unacceptable minimal grazing payments ranchers and corporations have paied over the years for the use of public lands. We greatly hope and urge the BLM WILL REQUIRE the standard going rate payments of $3-5000.00 per turbine per year.on every wind project developed on public lands. These funds should go to paying the salary of a wind project dedicated Ornithologist/Population Biologist that deals with the Wind Projects on BLM lands. This person must understand the wind industry,local wildlife populations and mortality monitoring proticals and how to reduce and minimize cumulative impacts over time to native protected species. 80063-12

13. We would urge the BLM to institute a educational component into every agreement signed with the wind industry. This would allow Grad. and Post-doc. Students from accredited colleges and universities across the west to do peer reviewed research on all wind farms on BLM lands. This would bring credibility and additional understanding of the impacts this new industry is having on a broad range of studies from economics to wildlife to climet. This would creat ballance in an industry that likes to generate their own numbers by hiring consultants. 80063-13

14. We recognize that wind is a clean renewable energy and that we all must consider the mess with the polluting alternatives, however here in the beginning age of this wind industry we all have an opportunity to help this industry grow in the right directions by setting precedents that will better and improve where and how this industry functions. 5-7000 turbines in one huge farm is not the answer, but rather 1-200 highly productive turbnes makes more sense. 80063-14

15. All proposed wind turbine farms on public lands should meet three very important criteria and these are.....
The site must have better than class 3 wind resources and the project must produce a minimum of 30% of the time and there must be a number set where bird and bat mortality 80063-15

will trigger removal of the offending turbines. This number must be tied to sustainable viable populations of any one species impacted. If these standards are not met then we the people are once again subsidizing huge multi-national corporations. We have often thought that only American owned companies should be allowed on American public lands! 80063-15 (cont.)

Thank-you for this notice and the opportunity to comment.

Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.

Responses for Document 80063

80063-001: As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including predesign surveys of habitats and wildlife occurrence and activity of the project area, will be conducted for any wind energy project proposed for BLM-administered lands. The scope, approach, and design for these site-specific analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific siting and design stipulations for incorporation into the POD. Details regarding the design of site-specific analyses are beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

80063-002: As required by the Wind Energy Development Program proposed policies and BMPs, site- and species-specific analyses, including evaluations of bird and bat occurrence and migrations within the proposed project area, will be conducted for any wind energy project proposed for BLM-administered lands. The scope and approach for these analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific siting and design stipulations for incorporation into the POD. No text change has been made to the document in response to your comment.

80063-003: As required by the Wind Energy Development Program proposed policies and BMPs (see Section 2), wildlife monitoring will be conducted for any wind energy project proposed for BLM-administered lands. The scope, approach, and duration of any wildlife monitoring program will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific stipulations for incorporation into the POD. Site-specific analyses are beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

80063-004: As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses will be conducted for any proposed project on BLM-administered lands in conjunction with input from other federal, state, and local agencies, and interested stakeholders. The establishment of a technical advisory committee to oversee activities at a given site would be a topic for consideration during the site-specific analyses.

80063-005: As stated in the 1st bullet in Section 2.2.3.1, Proposed Policies, the BLM will exclude wind energy development from specific areas. Exclusions of any additional areas from wind energy development will be determined at the project level as part of the site-specific analyses or through local land use planning efforts, with opportunities for full public involvement. As required by

the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including the development of an appropriate monitoring program, will be conducted for any proposed project on BLM-administered lands. The scope and approach for site-specific analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific stipulations for incorporation into the POD. Site-specific analyses are beyond the scope of the PEIS.

80063-006: Section 2.2.3.2.3, Construction, under the General heading, contains a BMP requiring addressing the burial of power collector lines on the wind project site. This BMP has been reworded to encourage the burial of all power collector lines unless burial would result in additional project-related habitat disturbance.

80063-007: The BLM has proposed a BMP that will prohibit the use of guy wires on permanent meteorological towers (see Section 2.2.3.2.3, Construction, under the Wildlife heading). The BLM does not intend to place additional restrictions on the type of turbine towers or their installation. These types of design issues will be driven by site-specific and project-specific requirements.

80063-008: Exclusions of specific areas, such as ridges and saddles, from wind energy development will be determined at the project level as part of the site-specific analyses or through local land use planning efforts, with opportunities for full public involvement. No text change has been made to the document in response to your comment.

80063-009: Exclusions of any additional areas from wind energy development will be determined at the project level as part of the site-specific analyses or through local land use planning efforts with opportunities for full public involvement.

80063-010: The Wind Energy Development Program proposed policies and BMPs require the use of existing roads and other right-of-ways (to the maximum extent feasible) and the development of a noxious weed control plan for any wind energy project proposed for BLM-administered lands. The extent to which additional access roads will be needed, and the details of the noxious weed control plan, will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific stipulations for incorporation into the POD. Site-specific descriptions are beyond the scope of the PEIS.

80063-011: As required by the Wind Energy Development Program proposed policies and BMPs, site-specific monitoring programs for bird and bat mortality will be designed and implemented for any wind energy project proposed for BLM-administered lands. The BMPs also require that observations of wildlife mortality be immediately reported to the BLM authorized officer. The scope

and approach for monitoring programs and details regarding data collection will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project- specific stipulations for incorporation into the POD. Site-specific details regarding data collection and handling are beyond the scope of the PEIS.

80063-012: Rental rates for wind energy development will be based on fair market value. A discussion of how rates are currently calculated can be found in Appendix A, page A-7. The proceeds generated from rentals are deposited in the federal treasury. BLM wildlife biologists will review the results of monitoring at wind energy development sites to determine their effect on wildlife populations and will participate in the development of adaptive management actions that may be required.

80063-013: Thank you for your comment. We appreciate your input and your participation in the public review process. The BLM will take your suggestion under advisement.

80063-014: Thank you for your comment. We appreciate your input and participation in the public review process.

80063-015: The MPDS constructed for the PEIS analyses is limited to Class 3 or higher wind resources because they are projected to be technologically developable over the next 20 years. A number of factors will determine the economic viability of individual projects and will be evaluated by the industry. This approach is preferable to establishing a minimum limit on production.

Regarding the establishment of bird and bat mortality limits, these issues also will be evaluated at the site- specific level during the planning process and throughout operations. As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including the development of an appropriate monitoring program, will be conducted for any proposed project on BLM-administered lands. The scope and approach for site-specific analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Furthermore, the program will require the incorporation of adaptive management strategies and monitoring programs at all wind energy development sites (see Section 2.2.3.1, Proposed Policies, last bullet, and Section 2.2.3.2.2, Plan of Development Preparation, General, 7th bullet). The application of adaptive management strategies will ensure that programmatic policies and BMPs will be revised as new data regarding the impacts of wind power projects become available. The source for a significant portion of the new data is likely to be the required site-specific monitoring programs that will evaluate environmental conditions at a site through all phases of development. A key requirement for the site-specific monitoring programs is that monitoring

observations and additional identified mitigation measures be incorporated into standard operating procedures and project-specific BMPs.

Document 80064

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 3:39 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80064

Thank you for your comment, mike gill.

The comment tracking number that has been assigned to your comment is 80064. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 03:38:53PM CDT

Wind Energy EIS Draft Comment: 80064

First Name: mike
Last Name: gill
Address: 1813 pacific ave
City: cheyenne
State: WY
Zip: 82007
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
At this time i dont think the goverment should get involved in wind energy. At this time i dont feel its fair to land owners who own land and are working on wind projects, and the goverment stepping in taking up what little space is available on the power grid as it is. Now when theere is enough new transmission lines run thru the country i believe that would be the time to get involved with doing it on BLM lands. It just isnt fair for the people who own land allready 80064-1

Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.

Response for Document 80064

80064-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80065

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 4:03 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80065

Thank you for your comment, Michele Fikel.

The comment tracking number that has been assigned to your comment is 80065. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 04:02:25PM CDT

Wind Energy EIS Draft Comment: 80065

First Name: Michele
Last Name: Fikel
Address: 405 S. 8th Street, Suite 301
City: Boise
State: ID
Zip: 83702
Country: USA
Email: maf5000@msn.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Will low altitude aircraft affect wind generation or affect the windmills? At what altitude would the wind power generators be affected? At what speeds? Will there be an altitude restriction placed over the wind energy farms? 80065-1

Thanks,

Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.

Response for Document 80065

80065-001: It is improbable that a low-flying aircraft could create sufficient turbulence to impact wind turbines. The BLM expects that wind farms utilizing turbines whose towers are tall enough to affect low-altitude aircraft or are located in established flight paths will be identified to pilots. In general, although wind turbines will create areas of turbulence both ahead of and behind their propellers, these areas are relatively small, and safety margins established by the FAA would keep all aircraft well away from such areas. As to whether airspace around wind farms will be further restricted, such decisions are the jurisdiction of the FAA and will be made at the appropriate time as part of the FAA's site-specific reviews of proposed wind farms.

Document 80066*

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 5:36 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80066

BLM_Wind_Energy
_PEIS_80066.doc...

Thank you for your comment, Steve Goddard.

The comment tracking number that has been assigned to your comment is 80066. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 05:35:35PM CDT

Wind Energy EIS Draft Comment: 80066

First Name: Steve
Last Name: Goddard
Organization: Idaho Wildlife Federation
Address: P.O. Box 6426
City: Boise
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Zip: 83707-6426
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Privacy Preference: Don't withhold name or address from public record
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Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.

* The comment numbers for this document appear to be out of sequence. However, some of the comments are repeated, and, therefore, were assigned the same number.

The Comments
Of the
Idaho Wildlife Federation
On the
BLM Wind Energy Programmatic PEIS

Page 2-5, Table 2.2.1.1, the 9100 acres for Idaho cannot be correct since there are four projects proposed that cover over 21,000 acres. The Brown's Bench proposal alone will impact about 13,000 acres. 80066-1

Page 5-37, p5.92 and 5-41, 5.9.2.2, Site construction and operations activities along with the transmission lines and roads may cause sage grouse to not only abandon the project area, but also abandon thousands of acres adjacent to the site. 80066-2

Page 5-43, Table 5.9.2.2, the interference with behavioral activities such as lekking would be long term, not short term as described in the table. 80066-3

Page 5-53; 5.19.32, same as above.

P 6-13. The statement that only a small amount of the BLM land would be developed is true in terms of acreage but is very misleading in the terms of impact on sage-grouse populations. The Cotterel and Brown's Bench project are an excellent example. They involve about 17,000 acres but all of the acreage is in sage grouse stronghold habitat and the impact of the projects may be the complete abandonment of thousands of additional acres by the birds due to their avoidance of tall structures such as the turbines and transmission lines. 80066-4

Table 6.4.1-1. As has already been stated supra, the 9,100 acres for Idaho is incorrect. There are already applications that cover over 20,000 acres. 80066-1 (cont.)

Page 6.21. The land area disturbance is much larger than is indicated. While the amount of the actual physical disturbance may be small, the impact on wildlife may be tremendous, especially with sage grouse in which data indicates that all leks within 3 kms of transmission lines dropped to zero. 80066-5

Page 6.25. The construction of transmission lines can have a profound impact when they are constructed in sage grouse habitat because they may led to lek abandonment and nesting. 80066-6

Page 6.27, p.6.5.3. The statement "During construction, operation, and decommissioning, individual animals would be impacted; entire populations, however, would be unlikely to be adversely impacted." is not correct, because the project may lead to the loss of entire populations over a large area. Examples of this would be the Cotterel and Brown's Bench projects in Idaho. 80066-7

P.6-28, 6.5.4. There cannot be mitigation for the complete loss of sage grouse populations. 80066-8

Responses for Document 80066

80066-001: The projected numbers of economically developable acres of BLM-administered lands presented in Tables 2.2.1- 1 and 6.4.1-1 are based on results of WinDS model analyses. These projections do not include existing capacity and are unlikely to correspond to specific initiatives underway or being considered. The purpose of the modeling efforts in this PEIS is to provide a general framework of possible development over the next 20 years, in order to assess the potential spatial, environmental, social, and economic impacts of implementing a Wind Energy Development Program for BLM-administered lands. The BLM recognizes that many factors can affect the accuracy of the projections, and, as discussed in Appendix B, a variety of factors will determine actual development levels. However, the MPDS and WinDS models employed in the PEIS are adequate for forecasting potential development levels over such a large geographic area and long, projected time frame. Greater accuracy in these forecasts would not likely result in changes to the requirements of the Wind Energy Development Program; that is, the proposed policies and BMPs would not be changed at this time. Under the proposed program, the BLM will employ adaptive management strategies to the oversight of wind energy development on BLM-administered lands, including any projects that may be proposed in Idaho. The BLM will monitor the level of wind energy development into the future as well as the effectiveness of its policies and BMPs. If necessary, adjustments to the programmatic requirements will be made.

80066-002: The Wind Energy Development Program proposed policies and BMPs presented in Section 2.2.3 identify a number of requirements that will be considered on a site-specific, project-by-project basis regarding the avoidance or minimization of construction and operation impacts to wildlife, including sage-grouse species. In addition, existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated into any proposed wind energy project on BLM-administered lands.

80066-003: The tables have been revised to indicate potential long-term and population-level effects for some species.

80066-004: The cited text is not intended to address impacts to sage-grouse or other resources, but rather to present a description of the physical acreages that could be developed on BLM-administered lands for wind energy. Cumulative impacts from habitat disturbance are discussed in Section 6.4.1.10. Potential effects of habitat disturbance on wildlife (including sage-grouse) habitat are presented in Section 5.9, and as required by the Wind Energy Development policies and BMPs, species-specific analyses will be conducted for any proposed project on BLM-administered lands, the scope of which will be determined on a project-by-project basis.

80066-005: The discussion of land area disturbance presented on this page (Section 6.4.2.1) deals only with impacts to land resources, not ecological resources. Impacts to ecological resources are discussed earlier in Section 6.4.1.10, and this discussion includes the potential for wildlife impacts to occur in areas outside the footprint of a wind energy facility.

80066-006: The Wind Energy Development Program proposed policies and BMPs presented in Section 2.2.3 identify a number of requirements and restrictions for avoiding or minimizing impacts to wildlife (including sage-grouse and their habitats) during the siting, design, construction, operation, and decommissioning of wind energy projects. The application of the policies and BMPs will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. In addition, existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated into any proposed wind energy project on BLM-administered lands. The application of the policies, BMPs, and sage-grouse guidance will occur at the site-specific level and is beyond the scope of the PEIS.

80066-007: The text has been revised to state that for some species, population-level effects may be possible. Additional text has been added to point out that through the conduct of species-specific and site-specific analyses conducted during all project phases, the potential for population-level effects would be minimized to the fullest extent possible.

80066-008: With the implementation of the Wind Energy Development Program proposed policies and BMPs identified in Section 2.2.3, together with site-specific analyses related to the siting, design, construction, operation, and decommissioning of proposed wind energy projects on BLM-administered lands, the complete loss of sage-grouse populations is implausible. The application of the policies and BMPs will be determined on a project-by- project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. In addition, existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated into any proposed wind energy project on BLM-administered lands, further reducing the likelihood that wind energy development would result in such a catastrophic impact.

Document 80067

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 6:14 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80067

WIWET-BLM-EIScomments-12-10-04...

Thank you for your comment, Thomas Carr.

The comment tracking number that has been assigned to your comment is 80067. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 06:14:00PM CDT

Wind Energy EIS Draft Comment: 80067

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Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.

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Comments of the Western Interconnection Wind Evaluation Team on the Bureau of Land Management's Draft Programmatic Environmental Impact Statement for Wind Energy Development

December 10, 2004

The Western Interstate Energy Board's Western Interconnection Wind Evaluation Team (WIWET) submits the following comments to the Bureau of Land Management (BLM) regarding the Draft Programmatic Environmental Impact Statement (PEIS) on Wind Energy Development on BLM-Administered Lands in the Western United States.

The PEIS supports BLM's effort to formulate a Wind Energy Development Program. WIWET understands the forthcoming policy to include the following: Development of comprehensive policies and Best Management Practices (BMPs) for all wind energy development projects on BLM lands; Amendment of land use plans to address energy development in those planning areas with future wind development; Implementation of a consistent right-of-way (ROW) application and grant process across all BLM lands; and Tiering of project-specific environmental analyses off the PEIS analysis, thereby allowing future analyses of wind energy projects to focus on site-specific issues of concern. 80067-1

I. BLM's Wind Energy Policy Is Consistent with Policies in the West to Encourage Greater Wind Energy Development

The Western Interstate Energy Board (WIEB) is an organization of energy officials from 12 Western states and three Canadian provinces. WIEB is charged with assisting in the implementation of energy policies of the Western Governors' Association (WGA). WIWET is a WIEB working-group whose objectives are to identify, evaluate and promote regional policies that support the development of wind resources in the Western Interconnection.

The Western Governors' Association Resolution 03-03 states:

> "Western Governors believe that the development and deployment of renewable energy technologies can benefit the region by: diversifying the region's energy supply; promoting the development of new technologies and Western companies in a growing global market; reducing air pollutants from energy production; providing a safety net in the event reductions in greenhouse gases are required; meeting our obligation for

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careful stewardship of our natural resources; providing a hedge against fluctuating energy prices; and saving precious water resources."

The WGA has adopted policies to expand the use of renewables and is launching a new effort with the goal of reaching 30,000 MW of "clean" energy generating capacity in the 18-state WGA region by 2015. Five individual states within the Western Interconnection have adopted Renewable Portfolio Standards (RPS) that target the amount of renewable energy used to produce electricity in a state: (1) Arizona (1.1% by 2007); California (20% by 2017); Colorado (10% by 2015); Nevada (15% by 2013); and New Mexico (10% by 2011). Wind will be playing a major role in the future generation resource mix of western states because of the declining cost of wind generation, implementation of state RPS, utility resource acquisition plans, extension of the Production Tax Credit, and high natural gas prices.

WIWET believes that the BLM's PEIS and Wind Energy Development Program facilitates and embraces the Governors' renewable energy policy, state RPS policies, and the market trend toward greater utilization of wind energy. 80067-1 (cont.)

The Team believes that the BLM's PEIS represents a comprehensive analysis of the potential impacts to the environment from the proposed Wind Energy Development Program. In particular, the Team acknowledges and recognizes the following specific elements of the PEIS.

- The Maximum Potential Development Scenario (MPDS) represents an upper bound of future wind energy development. The National Renewable Energy Lab (NREL) calculated MPDS by aggregating Class 3-7 wind resources across BLM lands in 11-western states after excluding protected lands (i.e. Wilderness, Wilderness Study Areas, National Monuments, and National Conservation Areas).

- The PEIS evaluates potential impacts to the many natural resources on BLM lands including air quality, wildlife and visual resources.

- The comparison of wind energy to other sources of energy illustrates an important benefit of wind energy with respect to air pollution. At page 6-22, Table 6.4.2-2 shows that wind energy generation produces zero air pollution emissions compared to significantly higher levels of air pollution emissions for coal, oil and natural gas generation per average megawatt.

- The PEIS examines the research of wind energy development on bird and bat collisions and mortalities, and proposes important mitigation measures.

- The BLM analysis addresses the impact of wind energy on visual resources and advances mitigation measures designed to minimize adverse impacts on the natural landscape.

- The PEIS provides an analysis of the economic impact of wind energy development on BLM land in 11 western states. Specific impacts were quantified for employment, income, gross state product, tax revenues, and ROW rental income. The study also addressed the impact of wind energy development on property values.

II. Western State Wind Energy Development May Exceed BLM's Forecast

The PEIS forecasts the amount of wind energy development by 2025 on BLM land in 11 western states will be 3,240 MW. The corresponding projection for wind energy on non-BLM lands in the 11 western states is 17,561 MW for a combined total of 20,801 MW in the 11 western states. See Table 1 below. Long-range forecasts are inherently fraught with uncertainty and qualifications. The forecast of wind energy development on BLM lands seems particularly conservative in light of the large amount of potential wind resources located in this region, the trend of state and federal policies to further promote wind energy, the rising price of natural gas, improvements of wind energy technology, and the potential expansion of transmission infrastructure to support wind development in this region.

As of November 2004, the American Wind Energy Association reports that the U.S. portion of the Western Interconnection has 3,274 MWs of installed wind generating capacity, another 1,781 MWs of planned wind energy, and a wind generation potential of more than 300,000 MWs. Montana and Wyoming are two western states with significantly large wind energy resources amounting to 116,000 MW and 85,000 MW of potential wind energy output, respectively. See Table 2 below. For example, AWEA reports that there is already 284 MW of wind energy in Wyoming, an amount the PEIS does not anticipate being reached until after 2015. In Colorado, Xcel Energy recently issued an RFP for 500 MW of wind energy which will be in addition to the existing installed capacity of nearly 230 MW. The combined total of 730 MW of wind energy in Colorado exceeds the PEIS forecast for 2015. 80067-2

Substantial wind resources also exist in Colorado, New Mexico, Nevada and California. The ability to tap wind resources in the west crucially depends on whether there are investments in transmission to bring the wind energy resources to load areas.

Table 1

BLM's Projected Wind Power Development (MW)		2005	2015	2025
Arizona	Non-BLM	19	37	192
	BLM	1	2	31
	Total	20	40	223
California	Non-BLM	2,830	5,395	7,651
	BLM	784	1,323	1,462
	Total	3,614	6,718	9,113
Colorado	Non-BLM	225	622	1,848
	BLM	33	67	85
	Total	258	688	1,933
Idaho	Non-BLM	75	156	916
	BLM	52	105	185
	Total	127	261	1,101
Montana	Non-BLM	121	397	1,287
	BLM	10	27	37
	Total	131	424	1,325
Nevada	Non-BLM	417	545	604
	BLM	388	574	701
	Total	805	1,119	1,305
New Mexic	Non-BLM	476	952	1,344
	BLM	54	108	199
	Total	530	1,060	1,543
Oregon	Non-BLM	452	743	1,562
	BLM	92	144	196
	Total	543	887	1,758
Utah	Non-BLM	162	467	485
	BLM	89	248	256
	Total	251	716	741
Washingto	Non-BLM	246	630	1,314
	BLM	3	6	12
	Total	249	636	1,326
Wyoming	Non-BLM	105	211	357
	BLM	12	24	75
	Total	117	234	433
Total	Non-BLM	5,128	10,154	17,561
	BLM	1,517	2,628	3,240
	Total	6,645	12,782	20,801

80067-2 (cont.)

Table 2

	Installed MW	Planned MW	Potential Ave.Power Output MW	National Rank
Arizona	NA	NA	NA	
California	2,051.2	367.6	6,770	17th
Colorado	229.2	6.0	54,900	11th
Idaho	0.2	381.5	8,290	13th
Montana	0.1	189.7	116,000	5th
Nevada	0.0	130.0	5,740	21st
New Mexico	205.3	60.0	49,700	12th
Oregon	260.1	0.0	4,870	23rd
Utah	0.2	0.0	2,770	26th
Washington	234.4	645.0	3,740	24th
Wyoming	284.6	0.0	85,000	7th
Total	3,265.3	1,779.8	337,780	

80067-2 (cont.)

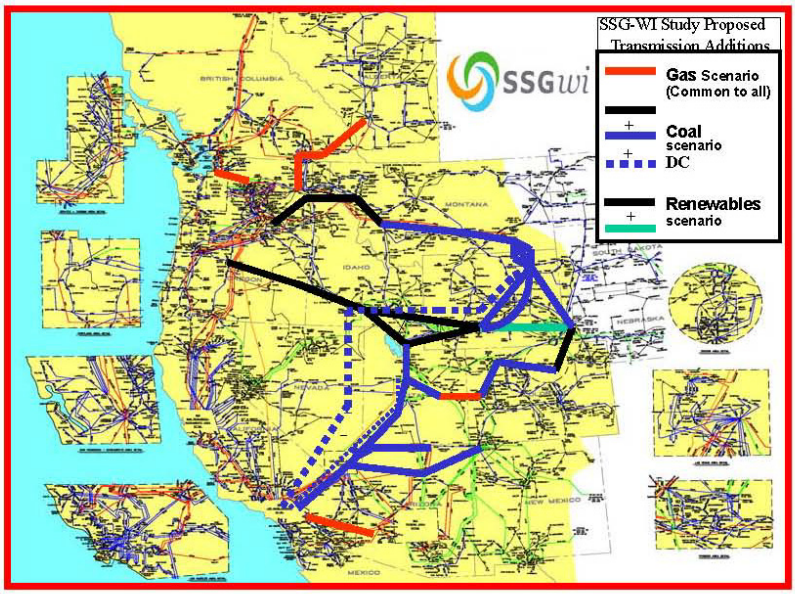
III. BLM and Other Federal Land Managers Need to Address Future Transmission Expansion for Wind Energy in the West

Transmission is the most significant limiting factor to wind development in the West. New transmission lines will be needed to connect the West's remote and vast wind resources to load centers. Future expansion of the western transmission lines will likely cross federal lands and thereby trigger federal review and permitting. While the current PEIS addresses wind development, it does not anticipate the corresponding potential expansion of new transmission lines over federal lands. WIWET understands that BLM and other federal entities intended to study the potential expansion of transmission facilities across federal lands in conjunction with future wind energy development. WIWET encourages the BLM and the Department of Energy, along with other federal land management entities such as the Forest Service, the Fish and Wildlife Service, the National Parks Service, and the Department of Defense, to develop a parallel policy and EIS review of new transmission projects in the West. 80067-3

Transmission expansion in the West is currently being explored by numerous planning efforts. The Seams Steering Group-Western Interconnection (SGG-WI) is an ad hoc group examining transmission expansion of the entire Western Interconnection. In October 2003, SSG-WI issued an initial report that evaluated new transmission infrastructure assuming three "bookend" generation scenarios that rely primarily on natural gas, coal or renewables. The SSG-WI renewables scenario included 21,400 MW of wind. Figure 1 shows transmission additions under the three bookend scenarios. SSG-WI is beginning a new analysis to model transmission needs under a "realistic" generation scenario that would fall somewhere within the bookend analysis done last year.

Figure 1

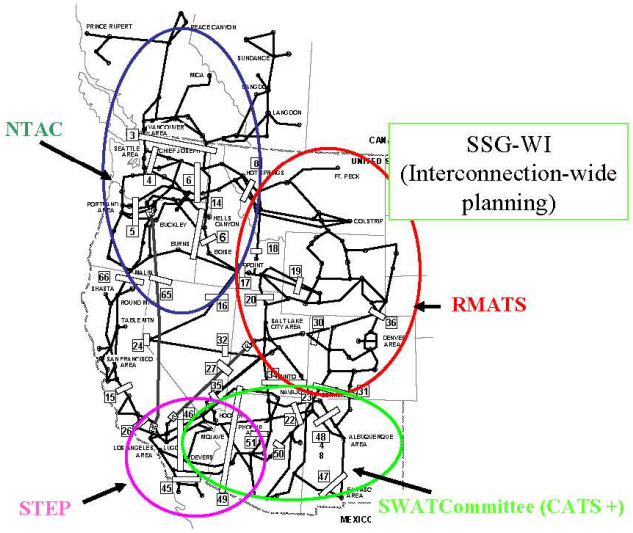
Transmission Expansion in SSG-WI Generation Scenarios



80067-3 (cont.)

In addition to SSG-WI, four sub-regional planning efforts are focusing on transmission within their respective smaller footprints: (1) Rocky Mountain Area Transmission Study (RMATS); (2) Southwest Area Transmission Planning Committee (SWAT); (3) Southwest Transmission Expansion Planning (STEP); and (4) Northwest Transmission Assessment Committee (NTAC). Figure 2 illustrates the project area under these sub-regional studies.

Figure 2
Interconnection-wide and Sub-Regional Transmission Planning in the Western Interconnection



80067-3 (cont.)

The RMATS Phase I report of September 2004 identified two different recommendations for development of energy resources and transmission expansion in the 5-state region of Montana, Wyoming, Utah, Idaho and Colorado. RMATS Recommendation 1 specified economical transmission additions to meet the future electrical load in the five-state region assuming 2,205 MW of wind energy, and additional coal projects. The three transmission projects in Recommendation 1 included: (1) the Montana system upgrade that would expand transmission capacity to the Northwest; (2) the Bridger west upgrades from Wyoming to Utah and Idaho; and (3) a Wyoming to Colorado upgrade.

The RMATS Recommendation 2 envisioned a bolder plan consisting of 4,955 MW of wind, more coal projects, and additional transmission additions to export electricity to coastal states. The transmission expansion includes significant upgrades within the Rocky Mountain region and at least two 500 Kv paths to markets on the West Coast and Southwest. Figures 3 and 4 show the maps depicting the economical transmission additions under Recommendations 1 and 2, respectively.

Figure 3
RMATS Recommendation 1

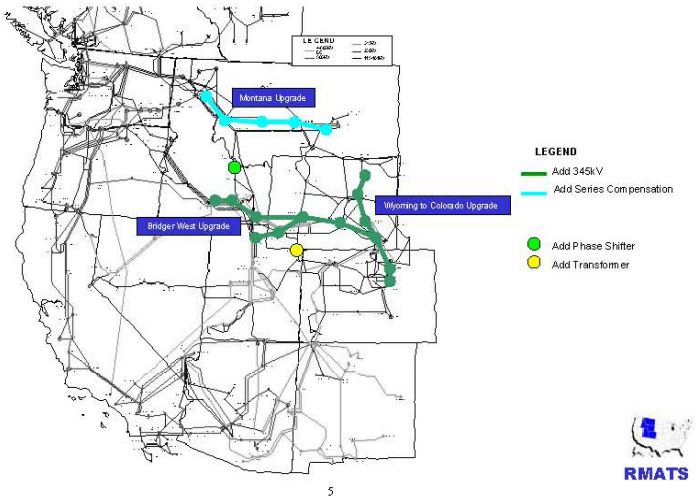
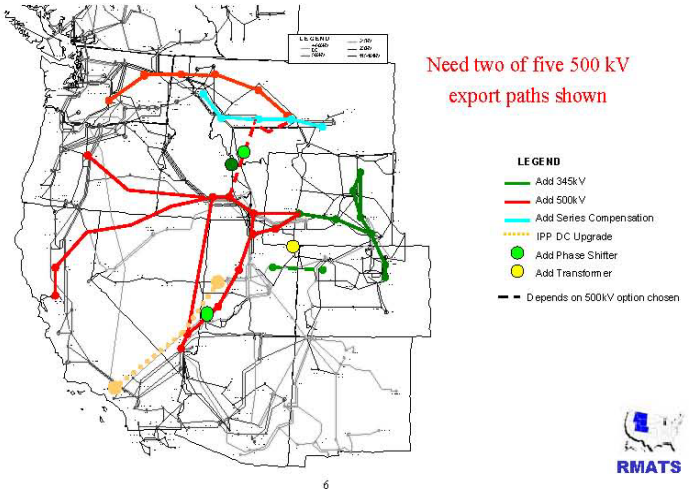


Figure 4
RMATS Recommendation 2 – Export Scenario



80067-3 (cont.)

The SWAT study is presently examining transmission needed to move New Mexico wind generation west and expects a report in January. The other two transmission planning processes, STEP and NTAC, are in the initial stages and have not released specific transmission proposals.

In addition to the sub-regional transmission planning efforts, some individual states are taking a close look at transmission expansion. The State of Nevada is completing an analysis of transmission needed to move wind and other renewable energy generation located in the northern part of the state to the Las Vegas area and export markets. California is examining transmission needs to meet its RPS and has directed major transmission expansion in the Tehachapi region to enable the development of wind resources.

The federal government is an important and large land holder throughout the West. See Table 3 below for the specific breakdown of federal land holdings in western states. The expansion of transmission lines across western states will invariably cross federal lands and require new permits and right-of-ways. The federal government should anticipate this trend and pursue a policy to analyze the potential impacts with a programmatic environmental impact statement.

Table 3

	Land Total Million Acres	Federal Surface Lands Million Acres	%	BLM Surface Land Million Acres	%
Arizona	72.69	33.0	45%	11.7	16%
California	100.21	45.0	45%	15.0	15%
Colorado	66.49	24.1	36%	8.4	13%
Idaho	52.93	33.1	63%	11.9	22%
Montana	93.27	26.1	28%	8.0	9%
Nevada	70.26	58.4	83%	47.8	68%
New Mexico	77.77	26.5	34%	13.4	17%
Oregon	61.60	32.4	53%	16.1	26%
Utah	52.70	34.0	65%	22.9	43%
Washington	42.69	12.2	29%	0.4	1%
Wyoming	62.34	30.0	48%	18.4	30%
Total	752.95	354.80	47%	174.0	23%

80067-3 (cont.)

WIWET appreciates the opportunity to provide comments on BLM's PEIS. The Team believes the project to be a step in the right direction to facilitate the development of wind resources in the West. WIWET looks forward to future collaboration with BLM in ensuring dependable, reasonably priced and environmentally sound energy supplies for western loads.

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Attachment: Western Interconnection Wind Evaluation Team members

The Western Interconnection Wind Evaluation Team

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Colorado	Colorado Governor's Office of Energy Conservation and Management	Ed Lewis
	Colorado Public Utilities Commission	Gary Schmitz
Idaho	Idaho Public Utilities Commission	Laura Nelson
	Idaho Department of Water Resources	Gerald Fleischer
Montana	Montana Department of Environmental Quality	Paul Cartwright
	Montana Consumer Council	Larry Nordell
Nebraska	Nebraska Energy Office	Larry Pearce
Nevada	Nevada State Energy Office	Pete Konesky Dick Burdette
New Mexico	New Mexico Department of Energy, Minerals and Natural Resources	Michael McDiarmid
	New Mexico PRC	Prasad Potturi
Oregon	Oregon Department of Energy	Phil Carver Carel deWinkle
Utah	Utah Energy Office	Vacant
Washington	Washington Department of Community, Trade and Economic Development	Tony Usibelli Greg Nothstein
Wyoming	Wyoming Governor's Office	Steve Ellenbecker
	Wyoming Consumer Advocate	Bryce Freeman

Responses for Document 80067

80067-001: Thank you for your comment. We appreciate your input and participation in the public review process.

80067-002: The projected wind power development presented in Table 5.13-1 is based on the results of WinDS model analyses. These projections do not include existing capacity and are unlikely to correspond directly to specific initiatives underway or being considered.

The purpose of the modeling efforts in this PEIS is to provide a general framework of possible development over the next 20 years, in order to assess the potential spatial, environmental, social, and economic impacts of implementing a Wind Energy Development Program for BLM-administered lands. The BLM recognizes that many factors can affect the accuracy of the projections, and, as discussed in Appendix B, a variety of factors will determine actual development levels. However, the MPDS and WinDS models employed in the PEIS are adequate for forecasting potential development levels over such a large geographic area and long, projected time frame. Greater accuracy in these forecasts would not likely result in changes to the requirements of the Wind Energy Development Program; that is, the proposed policies and BMPs would not be changed at this time. Under the proposed program, the BLM will employ adaptive management strategies to the oversight of wind energy development on BLM-administered lands. The BLM will monitor the level of wind energy development into the future as well as the effectiveness of its policies and BMPs. If necessary, adjustments to the programmatic requirements will be made.

80067-003: The BLM concurs with the Western Interconnection Wind Evaluation Team's (WIWET's) comments that transmission issues must be addressed through interagency consultation, in which the BLM intends to participate. In the interim, with respect to specific wind energy development projects on BLM-administered lands, the BLM will require site-specific analyses for each project to consider the potential impacts of required transmission system interconnects or expansions. These analyses will be conducted with input from other federal, state, and local agencies, and interested stakeholders.

Document 80068

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Friday, December 10, 2004 10:01 AM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80068

Thank you for your comment, Lisa Stapleton.

The comment tracking number that has been assigned to your comment is 80068. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 10, 2004 10:01:15AM CDT

Wind Energy EIS Draft Comment: 80068

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Comment Submitted:
I believe this study is necessary to establish alternative energy sources. Please keep up te good work! | 80068-1

Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.

Response for Document 80068

80068-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80069

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Friday, December 10, 2004 11:44 AM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80069

Comments_on_wind _eis_80069.doc...

Thank you for your comment, Andrew Orahoske.

The comment tracking number that has been assigned to your comment is 80069. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 10, 2004 11:43:45AM CDT

Wind Energy EIS Draft Comment: 80069

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Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.

TO: **Bureau of Land Management, Wind EIS**
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RE: **Comments on the U.S. Bureau of Land Management Draft Programmatic Wind Energy Environmental Impact Statement**
DATE: **December 10, 2004**

The Nature of a Programmatic EIS under NEPA

The Bureau of Land Management (BLM) claims to issue a draft programmatic environmental impact statement (PEIS) in pursuance of obligations imposed by the National Environmental Policy Act (NEPA). Whether a NEPA document is programmatic in nature depends upon the nature and scope of the proposed action document rather than the label of the document. As such, the analysis must be sufficiently comprehensive to identify and evaluate all potentially significant consequences of the proposal. Furthermore, if an agency decides to rely on a programmatic EIS for a decision on a site specific or project level activity, the impact statement must include the detailed information required to support the claim. 80069-1
The scope of the undertaking by the BLM in the present PEIS contemplates large scale regional and national development. "Although the agency has the discretion to define the scope its actions, such discretion does not allow the agency to determine the specificity required by NEPA." *City of Tenakee Springs v. Block*, 778 F.2d 1402,1407 (9th Cir. 1985). A project's site specific impacts should be evaluated when "the agency proposes to make an irreversible and irretrievable commitment of the availability of resources to a project at particular site. *California v. Block*, 690 F.2d 753 (9th Cir. 1982).

The PEIS fails to adequately analyze the full impact of the proposed action and

fails to determine, with enough the specificity, the scope of this impact. The BLM fails to satisfy the alternative requirements of NEPA, fails to adequately analyze the cumulative impacts of the proposed action with all other reasonable foreseeable actions, and fails to fully disclose the impacts on individual bird species, including mortality and habitat destruction and fragmentation. 80069-1 (cont.)

Range of Alternatives

The Council on Environmental Quality (CEQ) regulations directs that an EIS include a set alternatives along with the proposed action, and describes the alternatives section as "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. The regulation requires "a rigorous exploration . . . of all reasonable alternatives, and a discussion of about why any alternatives were eliminated from detailed study." *Id.* In addition the regulation requires "substantial treatment of each alternative…so that reviewers may compare their merits." *Id.*

The Draft PEIS does not provide an adequate survey of alternatives to the proposed action. Only three alternatives are provided in the current draft PEIS. In addition to the proposed action, the Draft EIS provides and evaluation of a no-action alternative and a limited development alternative. The proposed action would put in place a framework to implement the maximum potential development of wind energy projects on all BLM lands in the western U.S. outside a few congressionally or administratively withdrawn areas. "Under the limited wind energy development alternative, only three new wind energy projects would be developed on BLM-administered land, and expansion of capacity would occur at two existing sites over the period 2005 to 2015." Draft EIS p.6-8. 80069-2

Clearly there can be several more alternatives to the all or nothing approach of the BLM in the current Draft PEIS. Because the BLM fails to provide an adequate number of alternatives with sufficient detail, the current document fails the NEPA alternatives requirement. 80069-2 (cont.)

Cumulative impacts

The PEIS fails to take into account the cumulative effects of the development of wind projects as implemented in the proposed action with the development of other energy projects on public lands. In undeveloped areas of Wyoming and Montana, where large scale energy development is to occur (both wind and fossil fuels), the current PEIS should disclose and analyze relevant information and evaluate the combined effects of all types of planned energy development on BLM lands. In addition to not taking into account other energy development projects, the EIS fails to disclose the Executive Order 13212 which expedites the application process for energy development on BLM lands. 80069-3

In a section entitled "Impacts of Wind Energy Development versus other Sources of Energy", the EIS embarks on a completely meaningless and unnecessary evaluation of abstraction. Draft EIS p.6-20. The purpose of an EIS is to disclose the impacts on the environment of the proposed action. In comparing the impacts of other forms of energy development, a meaningful cumulative impacts analysis as required by NEPA must disclose and analyze the combined of affects of all reasonably foreseeable actions and the proposed action.

Fossil Fuel Energy Development

Passage of the Energy Policy and Conservation Act (EPCA) of 1975 emphasized the need to stabilize the supply of energy and develop fossil fuels located on federal 80069-4

public lands. 42 U.S.C. § 6201-6202. The reauthorization of the EPCA in 2000 also directed the U.S. Departments of Energy, Agriculture, and Interior to inventory all onshore oil and gas reserves and to identify impediments to the development of those resources. Public Law No. 106-469. Executive Order 13212, signed in 2001, stated that "agencies shall expedite their review of permits or take other actions as necessary to accelerate the completion of such projects, while maintaining safety, public health, and environmental protections." Executive Order 13212, 66 Fed. Reg. 28357 (May 18, 2001). In response, the BLM has followed an administrative policy to ensure the timely development of these critical energy resources in an environmentally sound manner and has directed land-use planners to not unduly restrict access to federal lands, while continuing to protect resources when they review oil and gas lease stipulations. U.S. Bureau of Land Management. 2003. Application for permit to drill (APD)-Process improvement #1—Comprehensive strategies. U.S. Bureau of Land Management, Washington Office, Instruction Memorandum IM 2003-152.

80069-4 (cont.)

Fossil fuel energy development is scheduled on both private and public lands overlapping the areas analyzed in this draft PEIS. This development is a highly destructive activity that destroys and fragments habitat and disrupts wildlife behavior during critical mating, calving and nesting periods. Expedited fossil fuel energy development is proposed for large parts of Wyoming and Montana, the heart of the major potential areas of wind development according to the draft PEIS. Current plans for the Powder River Basin in Wyoming envision 65,000 new wells, 27,000 miles of roads, and 53,000 miles of pipeline, powerlines, and utility corridors, an area over 80,000 square miles in size. Draft/Final Environmental Impact Statement and Draft Planning

Amendment for the Powder River Basin Oil and Gas Project (Wyoming) and Montana Statewide Draft/Final Oil and Gas Environmental Impact Statement and Amendment of the Powder River and Billings Resource Management Plans. 80069-4 (cont.)

Bird Mortality

The issue of bird mortality due to collisions with wind turbines often turns into an argument over what man-made sources kill the most birds. "Birds" is usually defined in the generic sense, and species differentiation is not usually part of the discussion. Such a discussion, however enlightening for the purposes of discovering the myriad of sources of bird mortality, does not inform the purpose of the current EIS. The issue presently before the BLM is to determine the impact of the proposed action on the environment. The overall mortality of individual bird species is one such impact. This impact is not conjectural or abstract and in fact has been the source of considerable controversy.

The Draft EIS quotes studies which blame skyscrapers, cars, transmission lines, pesticides and domestic cats for killing far more birds than wind turbines: "The number of bird collisions at wind energy projects is relatively small, when compared with collisions with other human-made structures." Draft EIS p.6-18. 80069-5

However, this comparison does little to enlighten the reviewer of the scope of the impact of the proposed action. Cats, no matter how mean and well fed, do not kill eagles. And, for that matter, hawks, shrikes, swans, storks or condors are equally safe from the vicious jaws of feral felines. To implicate other sources of mortality when evaluating the effects of bird mortality due to wind turbines simply misses the point. They are valuable numbers when calculating the overall mortality to all birds due to humans, but for the purposes of disclosing the effects of bird mortality due to the proposed action, they are

simply inadequate. The following report should be included in the discussion of bird mortality: W. Grainger Hunt et al., *Golden Eagles in a Perilous Landscape: Predicting The Effects Of Mitigation For Wind Turbine Blade-Strike Mortality*, University of California, Santa Cruz. California Energy Commission Report, 2002.) 80069-5 (cont.)

Effects on Sage Grouse

Wind energy developments, specifically the roads and transmission lines that fragment the landscape and provide perches for predatory raptors, pose a risk and impact on a potentially endangered or threatened species.

Sage grouse inhabited the western United States and southern Canada for tens of thousands of years, through ice ages, floods and drought. Lewis and Clark in 1806, described the numerous birds as clouds darkening the sky and fields of gray that moving across the landscape. Once numbering in the millions, their historic range encompassed the distribution of sagebrush on the prairie and steppe regions of what became 16 western states and three Canadian provinces.

80069-6

Since 1900, the sage grouse has been extirpated from the periphery of its range and they are now gone from Arizona, British Columbia, Kansas, Nebraska, New Mexico, and Oklahoma. Range wide population declines of 45-80 percent over the past 20 years due to habitat destruction, degradation and fragmentation, has left the population at less than 140,000 individuals, representing only about 8 percent of historic numbers. Furthermore, rather than possessing robust core populations, the sage grouse are sparsely distributed over vast tracts of degraded habitat.

The sage grouse is entirely dependent on sagebrush ecosystems that dominate much of western North America. Three fundamental characteristics of the sage brush

ecosystems have been altered from pre-settlement conditions. First, the total area covered by sagebrush is reduced, for example, approximately 75% of the sagebrush in the state of Washington and virtually all the sagebrush habitats in southern Idaho is now agricultural cropland. Second, the sagebrush habitat is degraded by non-native invasive species, especially cheatgrass (*Bromus tectorum*), the fire regime is altered and resulted in the loss of vast expanses of sagebrush. Overgrazing by cattle, perhaps more than any other single factor, has contributed to the marked degradation of habitat throughout the entire range of the sage grouse. Lastly, not only has the habitat disappeared and been degraded, it is increasingly fragmented by roads, powerlines, fences, and other developments, including oil and gas exploitation. Changes in quantity, composition, and configuration of sagebrush habitat is primary reason for the decline of the sage grouse.

Approximately 30% of the sagebrush lands in the United States are privately owned. Federal agencies in the United States are responsible for management of 66% of the sagebrush landscape, of which BLM manages one-half. Less than 1% of the range currently occupied by greater sage grouse, and very little sagebrush habitat overall is legally protected. Threats to the sage grouse and its habitat include livestock grazing, mining, energy development (including wind energy development), conversion to agriculture, and urbanization. The use of off-road vehicles degrades habitat and if allowed in lekking areas during the breeding season can directly impact populations of sage grouse. 80069-6 (cont.)

In April 2004, the USFWS issued a 90-day finding for three petitions to list the greater sage-grouse (*Centrocercus urophasianus*) as threatened or endangered, under the Endangered Species Act (ESA) of 1973, as amended. 69 Fed. Reg. 21484, 21484 (April

21, 2004). The Service found that the petition and other information presented substantial information indicating that listing of the greater sage-grouse may be warranted. *Id.* at 21484. The Western Association of Fish and Wildlife Agencies (WAFWA) completed a report in June 2004 which echoed the calls of alarm trumpeted by the petition to list filed by the coalition of environmental organizations. Connelly, J. W., S. T. Knick, M. A. Schroeder, and S. J. Stiver. 2004. *Conservation Assessment of Greater Sage-grouse and Sagebrush Habitats*. Western Association of Fish and Wildlife Agencies. Unpublished Report. Cheyenne, Wyoming. 80069-6 (cont.)

Reliance on the Programmatic EIS for Site-specific Analysis

The level of environmental assessment required at the in project level is independent of the supposed requirements stated in the Draft EIS. Each federal action that may significantly affect the environment requires the preparation of an EIS that fully discloses and analyzes all potential impacts. The BLM should not necessarily use this programmatic EIS as a way of avoiding the obligations imposed by NEPA. While the draft PEIS addresses this issue as follows, the reliance on a vague and general PEIS does not satisfy the mandate of NEPA to fully evaluate the site specific effects. 80069-7

> The level of environmental assessment to be required for individual wind power projects will be determined at the Field Office level. In certain instances, it may be determined that an environmental assessment (EA) is sufficient in lieu of an EIS. To the extent that this PEIS addresses anticipated issues and concerns associated with an individual project, including potential cumulative impacts, the BLM will tier off of the decisions embedded in this PEIS and limit the scope of additional project-specific NEPA analyses. In particular, the mitigation measures discussed in Chapter 5 may be consulted in determining site-specific requirements. Public involvement will be incorporated into all wind energy development projects to ensure that all concerns and issues are identified and adequately addressed.

Draft EIS p.2-7.

Responses for Document 80069

80069-001: The PEIS analyzes the impact of establishing and implementing a Wind Energy Development Program on BLM-administered lands in 11 western states. Site-specific analyses are beyond the scope of the PEIS. As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including additional cumulative impact analyses, if necessary, will be conducted for any proposed project on BLM-administered lands. The scope and approach for site-specific and species-specific analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies and interested stakeholders. Alternatives analyzed in the PEIS were selected to provide a reasonable range of approaches for increasing wind energy development on BLM-administered lands. No additional alternatives were identified during the public scoping process. Cumulative impacts, addressed in the PEIS in Section 6.4, include those effects that could result from incremental impacts of development in accordance with the terms and conditions of the proposed Wind Energy Development Program when added to other past, present, and reasonably foreseeable future actions.

80069-002: The PEIS meets the requirements of the CEQ regulations for analysis of alternatives by evaluating a set of alternatives that presents a range of options. Scoping was conducted as required, in part, to identify the range of alternatives to be considered. Comments received during the scoping process did not identify any additional alternatives.

80069-003: A new BMP has been inserted in Section 2.2.3.1, Proposed Policies, to ensure that site-specific NEPA analyses will identify and assess any cumulative impacts that are beyond the scope of the cumulative impacts addressed in the PEIS. The lack of certainty at this time on the location, timing, and types of new energy facilities on BLM- administered lands does not allow for a meaningful, detailed analysis of cumulative impacts when considered along with wind energy facilities.

80069-004: As discussed in the previous response, cumulative analyses will be conducted during site-specific NEPA analyses to the extent the potential impacts are beyond the scope assessed in the PEIS. This would include assessments of cumulative impacts of other energy development activities in the area.

80069-005: The presentation of other causes of bird mortality are included to identify other sources of mortality to which wind energy impacts may cumulatively contribute. The discussion of bird mortality associated with collisions with wind energy facility structures presents mortality rates that have been reported at existing facilities. The discussion further points out that depending on the species involved, population-level effects may occur for some species. As required by the Wind Energy Development Program proposed policies and BMPs, species- and site- specific analyses will be conducted for any proposed

wind energy project on BLM-administered lands. The intent of these analyses is to identify important, sensitive, or vulnerable ecological resources that could be impacted by a wind energy facility, and to aid in the siting, design, and operational stipulations for avoiding (if possible), mitigating, or minimizing impacts to those resources. The scope and approach for the site-specific analyses will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. Through this process, the BLM will develop project-specific siting, design, and operational stipulations for incorporation into the POD.

The Hunt (2002) document suggested for inclusion in the PEIS is already cited; see the text box on compatibility of wind energy development and raptors presented in Section 5.9.3.2.3. No text change has been made to the document in response to your comment.

80069-006: The Wind Energy Development Program proposed policies and BMPs presented in Section 2.2.3 include numerous surveys and monitoring requirements; siting and design constraints; and construction, operation, and decommissioning requirements for mitigating environmental impacts. These will be required for any proposed wind energy project on BLM-administered lands. The scope and implementation of these policies and BMPs will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. In addition, existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated at the project level, as applicable.

80069-007: The mandate of NEPA is fulfilled in the PEIS, as appropriate, at the programmatic level. The site-specific impacts that are not within the scope of this PEIS will be evaluated in site-specific NEPA documents. To clarify this point in the PEIS, the proposed policy in Section 2.2.3.1 regarding site-specific NEPA analyses has been modified.

Document 80070

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Friday, December 10, 2004 1:16 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80070

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ENTS_v2_80070.dc

Thank you for your comment, Jack Bush.

The comment tracking number that has been assigned to your comment is 80070. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 10, 2004 01:15:36PM CDT

Wind Energy EIS Draft Comment: 80070

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Questions about submitting comments over the Web? Contact us at: windeiswebmaster@anl.gov or call the Wind Energy EIS Webmaster at (630)252-6182.