1). Avoidance of impacted areas by breeding birds. Evidence suggests prairie grouse avoid disturbed areas, especially those with a proliferation of tall structures.

2). Additional impact of support infrastructure. All wind power developments will come with a complete set of powerlines, roads, etc. These will substantially increase the overall size of the project area.

3). Lack of empirical data guiding siting decisions and mitigation measures. No one has had a chance to experimentally manipulate areas and examine the response of prairie grouse. Thus, all decisions on siting and mitigation are based on what largely amounts to opinion and guess work.

4). Lack of concern about environmental impacts. This stuff is being sold to the public as "green energy" but there is no free lunch. Wind power advocates should be open about potential impacts. This may force them to think more realistically about environmental costs and appropriate mitigation.

5). Direct and indirect mortality. Direct from birds colliding with structures, including fences, powerlines, etc. Indirect from providing additional perch sites for predators.

To Whom It May Concern:

The North American Grouse Partnership (NAGP) welcomes the opportunity to comment on the Bureau of Land Management's (BLM) draft Programmatic Environmental Impact Statement (DPEIS) for wind energy development on BLM lands in the western United States. We believe that commercial wind power development on public lands is an issue of great importance to the future of many species of raptors and grassland and shrubland-dependent wildlife, especially North American grouse. Because public lands often provide the last vestiges of expansive, unfragmented rangeland on which prairie grouse depend for survival, the nature of content of BLM's final PEIS is of great interest to NAGP and its growing membership.

NAGP is a non-profit organization whose mission is to promote the conservation of grouse and the habitats necessary for their survival and reproduction. Our membership spans all of North America, with Chapters engaged in conservation projects and many local working groups addressing grouse management issues.

After reviewing BLM's DPEIS, NAGP offers qualified support for the proposed alternative to establish an overarching programmatic document that guides wind power development on all BLM lands. However, we provide this comment with multiple caveats, discussed later, that relate to the specific content of particular sections of the DPEIS.

80080-1

The other alternatives proposed, i.e. "no action" and "no new projects", do not reflect the interests of NAGP and what we believe is in the best interest of grouse conservation nationwide. Specifically, the "no action" alternative would allow wind power

development projects to proceed, but all direct and indirect impacts to grouse and other wildlife species of concern would have to be repeatedly debated on a case-by-case basis. Apart from creating a greater work load for NAGP leadership to "reinvent the wheel" to guarantee basic resource conservation on each and every project, this alternative would allow inconsistencies among projects throughout the country. NAGP realizes, as the DPEIS indicates, that regardless of whether a programmatic BLM document exists or not, specific wind projects and the Resource Management Plan amendments required to facilitate them will allow ample opportunity for NAGP input related to site-specific and species-specific concerns.

80080-1 (cont.)

The "limited wind energy development" alternative would only allow currently pending or proposed wind development projects to proceed, and would prohibit any new projects on BLM lands in the future. The NAGP wants to emphasize that we do not unilaterally oppose wind power development on public lands. In fact, we believe that expanding and facilitating the adoption of alternative energy sources in the U.S. is important to our collective future. We are firm in the opinion that wind power development, when properly sited, monitored and researched, is not exclusionary to wildlife conservation.

Our specific comments related to sections of the DPEIS are as follows:

The DPEIS states (Section 1.2) that "The analysis conducted in preparation of this PEIS was based on current, available, and credible scientific data. Programmatic policies and BMPs incorporated into the BLM's proposed Wind Energy Development Program are based on an interpretation of these scientific data and decisions on relevant mitigation requirements. Direct and indirect impacts of wind energy development on the environment, social systems and the economy, as discussed at the programmatic level, have been evaluated. Cumulative impacts associated with the proposed action have also been evaluated." The DPEIS further states that " . . . . this PEIS identifies the range of potential impacts and identifies relevant mitigation measures."

80080-2

The NAGP questions the accuracy of these statements. First, substantial scientific interest and credible input from grouse experts across the country have been generated on the subject of wind turbine placement in sensitive grouse habitats over the last 2-3 years. In fact, the American Wind Energy Association (AWEA) now recognizes that habitat fragmentation, and not collision, is a principle concern determining wind project siting. However, throughout the DPEIS, little if any discussion is given to potential for serious indirect impacts to prairie grouse and other grassland-dependent species. The potential impacts due to habitat fragmentation are so severe and so well-recognized that one state (KS) went so far as to put a moratorium on any future wind developments in key grouse areas. Yet, this DPEIS gives almost no discussion to the degree of risk to prairie grouse, especially Sage Grouse.

This DPEIS neither adequately identifies the range of potential impacts nor has the ability to identify relevant mitigation measures. Lacking the comprehensive research to substantiate this claim, NAGP's position is that programmatically-approved commercial wind projects should not be allowed to proceed throughout this nation's public lands.

80080-3

Ample opportunities to conduct and review the necessary research are currently available on private lands. 80080-3 (cont.)

Concerning the cumulative effects of all future projects on BLM lands, the DPEIS indicates that the maximum possible extent of future wind energy development over the next 20 years could exceed 20 million acres, or nearly 9 percent of the total BLM land area in the west. NAGP is concerned that these acreage estimates are based on the actual footprint of the wind facilities, and not inclusive of the immediate surrounding habitats that will likely be indirectly affected via habitat abandonment and avoidance due to structural habitat fragmentation. Greater clarification on the potential acreage impacted is needed in the final document, and we recommend that BLM include, at a minimum, a 1-mile radius of impact surrounding each turbine. 80080-4

In table 2.2.1-1, the DPEIS identifies the total amount of "potentially developable land", and then identifies the "total economically developable land". The NAGP cannot provide comments on these acreage figures because the DPEIS does not identify how these areas are determined. This needs clarification in the final PEIS. We strongly caution, however, that the "variety of factors e.g., economic, social, and political that are beyond BLM's control or influence . . . "could markedly change over the next 20 years. If anything, the demand for domestic, renewable energy sources will increase, rather than decrease, BLM's current projected acreage estimate. This DPEIS alludes otherwise, which we believe is an inaccurate portrayal. 80080-5

In section 2.2.3.2.2., the Plan of Development Preparation, the DPEIS requests that operators conduct surveys for federally and/or state-protected species of concern, including special status plant and animal species, within the project areas and design the project to minimize or mitigate the impact to these resources. The NAGP has two specific comments regarding this section. First, it has been our observation that few wind developers allow adequate time or resources to properly survey potential development areas pre-construction. Often time, they will allocate a few thousand dollars over the course of two weeks to determine presence/absence. This is woefully insufficient to determine the direct, indirect, and cumulative impacts to grouse populations. Further, too much emphasis is given to temporally avoiding disturbance of "mating grounds", presumably prairie grouse leks. Even a cursory investigation into grouse ecology reveals that disturbance during the lekking period is not the primary concern – it's habitat fragmentation throughout individual birds' home ranges year round that is the ultimate problem. Merely shutting down site construction for the 2-week peak of lekking activity does almost nothing to protect the species in the vicinity long term. While leks are an easy location to determine presence or absence of grouse species, far too much emphasis is placed on temporal lek protection as a substitute for proper landscape level planning to avoid, minimize, and mitigate resulting habitat fragmentation of the wind structures. 80080-6

Along those same lines, throughout the entire DEPIS document, especially in regard to wildlife and ecological concerns, BLM repeated indicates that they will minimize and mitigate resource impacts. As stated earlier, this task cannot be carried out without the comprehensive research data that is currently lacking. However, our issue is that, in 80080-7

conflict with almost all other guidance for federal activities, BLM's DPEIS does not suggest to first "avoid" impacts. Clearly, there will be a large number of proposed wind development sites where construction is simply not appropriate due to overwhelming ecological concerns. We urge the authors to incorporate the words "avoid, minimize, and mitigate", in that specific order, where direct and indirect impacts are likely.

80080-7 (cont.)

In this same section, the DPEIS appears to have made several significant oversights relative to wildlife impacts. First, it says nothing about the potential for removing wind turbines should post-construction impact exceed those predicted. Given that grouse experts have voiced a near-concensus opinion that the indirect impacts to grouse could be severe, NAGP's position is that a removal stipulation should be required for all new facilities that are constructed on BLM lands. Especially if BLM's primary intention for drafting this programmatic document is to hasten construction without adequately quantifying direct, indirect, and cumulative impacts, the NAGP strongly requests that stipulations be in place to reverse unforeseen and unacceptable damages to natural resources. Likewise, until an adequate and thorough research base is established, BLM should include in this section the requirement that adequate pre and post-construction research be funded by the developers on all wind projects installed within occupied grouse habitats.

80080-8

Under section 2.2.3.2.3 – Construction, the DPEIS will require that operators restore the site to "natural habitat' post construction. Again, the NAGP emphasizes that the greatest concern with wind power development is the structural habitat fragmentation from the tower itself, and not the soil disturbance on the construction pad. This type of habitat degradation can neither be minimized nor restored. This section gives no treatment to the issue of greatest potential risk to wildlife.

80080-9

Responses for Document 80080

80080-001: Thank you for your comment. We appreciate your input and participation in the public review process.

80080-002: The PEIS is a programmatic document. Sage-grouse is only one group of biota that could be affected by wind energy development. To fully address individual groups and species is beyond the scope of this document. As required by the Wind Energy Development Program proposed policies and BMPs, species-specific analyses will be conducted for any wind energy project proposed for 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 stipulations for incorporation into the POD. Regarding sage-grouse species, existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated into local, site-specific analyses. Species-specific analyses are beyond the scope of the PEIS.

80080-003: The PEIS does not approve specific wind energy projects. As required by the proposed Wind Energy Development Program proposed policies and BMPs, 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. Regarding sage-grouse species, existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated into local, site-specific analyses.

80080-004: The amount of land likely to be disturbed by wind energy turbine construction will depend on the size and specific location of the turbine.

As discussed in Section 2.2.1 and Appendix B, the 20-million acre (8-million ha) estimate reflects the amount of lands on which developable wind resources exist (Class 3 or higher) and is not defined on the basis of the footprint of individual turbines. The results of the WinDS model indicate that a much smaller portion of lands will be economically developable (160,100 acres [64,750 ha]) when various constraints are modeled. Again, the acreage estimate of economically developable lands reflects the total acreage where the wind resource is present — not just the footprint of turbines and related facilities. As stated in the introductory text to Chapter 5, the BLM acknowledges that the area of impact may be greater for some resources than for others. The area of potential impact for some resources may extend beyond the project area (facility boundary). Consideration was given to those potential impacts as relevant to specific resources.

80080-005: Section 2.2.1 and Appendix B explain how the number of acres of potentially developable lands and the number of acres of economically developable lands are calculated.

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 a variety of factors will determine actual development levels and agrees that many of these factors will change over the next 20 years. 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.

80080-006: As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including preconstruction surveys, will be conducted for any proposed project on BLM-administered lands. The scope and approach of 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. Regarding sage-grouse species, existing BLM guidance on the management of sage-grouse and sage-grouse habitats will be incorporated into local, site-specific analyses. Site-specific analyses are beyond the scope of the PEIS.

80080-007: The language in the BMPs has been changed, where appropriate, to include the term "avoid (if possible)."

80080-008: As required by the Wind Energy Development Program proposed policies and BMPs, site- and species-specific analyses, including pre- and postconstruction surveys and monitoring programs, will be conducted for any wind energy project proposed for BLM-administered lands. 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. Regarding sage-grouse species, existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated into local, site-specific analyses. 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.

In addition, the BLM is committed to full implementation of the proposed Wind Energy Development Program, elements of which 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 the requirement that monitoring observations and additional identified mitigation measures be incorporated into standard operating procedures and project-specific BMPs.

80080-009: The PEIS discusses habitat fragmentation in Section 5; see particularly Section 5.9.3.2. Regarding sage- grouse species, existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated into local, site-specific analyses. Species-specific analyses are beyond the scope of the PEIS.

Document 80081

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Friday, December 10, 2004 3:54 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80081

Thank you for your comment, John Robison.

The comment tracking number that has been assigned to your comment is 80081. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 10, 2004 03:54:05PM CDT

Wind Energy EIS Draft Comment: 80081

First Name: John
Middle Initial: M
Last Name: Robison
Organization: Idaho Conservation League
Address: PO Box 844
City: Boise
State: ID
Zip: 83701
Country: USA
Privacy Preference: Don't withhold name or address from public record

wildidaho.org

Idaho Conservation League
PO Box 844, Boise, ID 83701 208.345.6933 Fax 208.344.0344

BLM Wind Energy Programmatic EIS
Argonne National Laboratory EAD/900
9700 S. Cass Avenue, Argonne, IL 60439

December 10, 2004

RE: Comments for DPEIS on Wind Energy Development on BLM lands

To Whom It May Concern:

Thank you for the opportunity to provide comments for BLM's DPEIS for National Wind Energy Program and Policy. The Idaho Conservation League has a long history of involvement with both habitat protection and energy development. As Idaho's largest statewide conservation organization, we represent members who care deeply about both protecting wildlife habitat and encouraging renewable energy supplies.

Our comments on the PDEIS and our original scoping comments are attached below.

John Robison
Conservation Associate

Ketchum Field Office: PO Box 2671, Ketchum, ID 83340 208.726.7485 Fax 208.726.1821 Moscow Field Office: PO Box 9783, Moscow, ID 83843 208.882.1010 Fax 208.883.7755

Idaho Conservation League comments for DPEIS on Wind Energy Development on BLM lands

Insufficient range of alternatives

We are concerned that the DPEIS overlooks an important middle-ground alternative. The DPEIS focuses on Maximum Potential Development Scenario, a Limited Development Scenario, and a No Action Alternative with no programmatic oversight. While we appreciate the fact that the Maximum Potential Development Scenario determined Wilderness Study Areas and other sensitive areas to be off limits to development, the BLM is overlooking another set of possibilities.

The PEIS needs to analyze a "Medium Potential Development Scenario" alternative that analyzes the effects under slightly more restrictive screening requirements. For example, this moderate alternative might consider only areas rated for Class 5-7 Condition Winds and the area must be accessible, and have transmission lines, among other criteria.

The PDEIS incorrectly states that the "proposed action, therefore, would provide a comprehensive approach for ensuring that environmental impacts would be minimized to the greatest extent possible" (PDEIS 2-30). There is a direct correlation between the extent of wind development and environmental impacts: "The amount of habitat that would be disturbed would be a function of the size of the proposed wind energy project…"(PDEIS 5-41). A Medium Potential Development Scenario would certainly minimize environmental impacts to a greater degree and might still offer the majority of economic benefits of the proposed alternative. Instead of analyzing (and encouraging) the maximum possible development and disturbance, this alternative could result in potentially far fewer environmental costs. As such, the BLM has an obligation to analyze this alternative. 80081-1

The PDEIS incorrectly states, "No other alternatives were suggested during the scoping process." Other alternatives should have been developed as a result of the scoping process (see ICL's scoping comments below for example). The PDEIS implies that all comments received espouse maximum development instead of a more reasonable, moderate development, as described in ICL's letter.

Categorical exclusions

The BLM should NOT utilize existing Categorical Exclusions for issuing short-term ROWs for wind energy testing. Wind development is significantly different from previous CX's as described in DOI Department Manual 516, Chapter 11, Sec. 11.5, E(19)(DOI 2004) because these proposals do not entail rehabilitating the land to its original condition and the environmental effects are potentially much more damaging than the original authorizations. 80081-2

Monitoring

While the PDEIS mentions monitoring programs, it does not describe the need for long-term, baseline monitoring before project consideration. The proposed monitoring starts during construction. We are concerned that long-term pre-project monitoring is needed for species such as sage grouse which may be adversely affected by not only the construction but also the continued existence of structures. 80081-3

Cultural resources

The PDEIS mentions avoidance of culturally sensitive areas as one of several mitigation measures. The PDEIS should stress that avoidance of these areas is the preferred method to avoid adverse impacts to cultural resources. 80081-4

BLM Wind Energy Programmatic EIS Scoping
Argonne National Laboratory EAD/900
9700 S. Cass Avenue, Argonne, IL 60439

December 17, 2003

RE: Scoping comments for National Wind Energy Program and Policy

To Whom It May Concern:
Thank you for the opportunity to provide scoping comments for BLM's National Wind Energy Program and Policy. The Idaho Conservation League has a long history of involvement with both habitat protection and energy development. As Idaho's largest statewide conservation organization, we represent members who care deeply about both protecting wildlife habitat and encouraging renewable energy supplies.

Investing in properly sited renewable energy generation, such as wind power, can protect the environment, promote economic development, diversify the power system and keep the region economically competitive. Wind projects have the great benefit of not degrading air, water, and fisheries impacts, as do these other power resources.

The impact of wind power largely depends on the location of the project and the specific technologies employed in the final development. While the conservation community supports renewal energy, we are concerned that the Bush Administration will "streamline" regulations for wind power as it has with oil and gas development. We want to ensure that facilities are properly sited to reduce conflicts with wildlife, recreationists, and communities.

Our comments are attached below. Please keep us on the mailing list to receive the DEIS and all other documents related to this proposal.

Sincerely,

John Robison
Conservation Associate

Idaho Conservation League scoping comments for National Wind Energy Program and Policy

Need for substantive PEIS

Idaho is rated 14th in the nation for wind power potential and current wind project applications on BLM lands cover over 26,000 acres, often overlapping with critical habitat for sage grouse and other wildlife. Energy companies are currently given maps of wind potential without adequate information about migratory pathways for birds and bats, habitat needs of sensitive species, or locations of cultural resources in these areas. Sensitive areas and migratory pathways need to be identified and designated of limits before projects. Environmental protections in land use plans and sensible timelines to approve projects need to be developed and maintained.

We are concerned that current Resource Management Plans recommendations for wind development are not objective. For example, the draft plans for the Bruneau RMP contain information only on high wind areas and distance to transmission lines, and nothing on sensitive species.

To serve as another example, the Browns Bench project on the Lower Snake River District is not a suitable location for wind development because this area also serves as key habitat for sage grouse.

We thought that the BLM had already received direction when a conflict of this type arises. The Interim Wind Energy Development Policy regarding Right-of-Way-Management issued by the United States Department of Interior Bureau of Land Management on October 16, 2002 states that "Negative impacts can be minimized by avoiding special management areas with land use restrictions, avoiding major avian migration routes and areas of critical habitat for species of concern, establishing siting criteria to minimize soil disturbance and erosion on steep slopes, utilizing visual resource management guidelines to assist in proper siting of facilities, avoiding significant historic and cultural resource sites, and mitigating conflicts with other uses of the public lands."

Despite our recommendations to exercise caution, the Jarbidge Field Office authorized the Renewable Energy System's application to construct anemometers in this location. A wind-turbine operation is a foreseeable action stemming from the investigation and we believe that an EIS was warranted before issuing a Right of Way. Proceeding ahead with the testing can serve no useful purpose since full development of this site cannot occur.

We believe that the Programmatic EIS needs to do a better job of providing direction when situations like this arise. By taking this big picture look, the BLM can help locate wind power projects in locations where there is a sufficient and steady wind supply and environmental concerns can be more easily addressed. Unless the BLM is able to better advise wind energy companies on suitable locations, the wind companies will continue to expend time and energy pursuing projects in environmentally unacceptable locations, adding to costs and delaying the development of much-needed alternative energy supplies.

Sage grouse
Wind-swept ridges may serve as strongholds for sage grouse, which has been identified by the BLM as a "sensitive species." Sage grouse habitat has been severely fragmented and reduced through a variety of land management practices, including overgrazing and road construction. Sage grouse avoid tall structures such as anemometers, turbines, and transmission lines. The presence of anemometers, turbines, and roads will decrease the suitability of these sites for sage grouse. Key habitat areas such as this need to be protected from further degradation and the PEIS needs to clarify factors making sites inappropriate for any aspect of a wind energy project.

The proliferation of wind projects throughout Idaho could degrade sage grouse habitat enough to warrant listing this species. Petitions have already been submitted to list sage grouse as a threatened species. The impacts of such a listing would have severe ramifications on land management activities throughout Idaho, from grazing to recreation.

Additional studies
More studies are needed on the effects of wind infrastructure on sensitive species. For example, sage grouse actively avoid overhead structures because of associations with raptors but no studies have been conducted on the effect of wind turbines on this sensitive species.

In addition, the Programmatic EIS needs to examine the cumulative effects of wind energy development on neotropical migrants, raptors, bats, mule deer, pronghorn, predators, and ground squirrels.

Noxious weeds
The most cost-effective way to deal with noxious weeds is to protect strongholds of native vegetation from activities which either spread noxious weeds directly or create suitable habitat by removing native vegetation and disturbing the soil. As with any ground disturbing activity, anemometer and turbine construction is likely to provide a vector for weed infestations. The PEIS needs to analyze what steps will be taken to minimize and mitigate for this effect. The PEIS should evaluate the following measures: (1) avoiding entry to areas of intact native vegetation, (2) requiring construction only under dry conditions, (3) requiring equipment wash operations before entering the construction site, and (4) promptly re-seeding disturbed areas with native seed.

Recreation and Visual Quality Standards
The PEIS needs to recognize that wind power structures and infrastructure are inconsistent with many viewsheds and visual quality standards for recreationists. The location and magnitude of roads, transmission lines, and support facilities should minimize environmental impacts to sensitive species, cultural resources, and viewsheds.

Conclusion

Wind projects are important to the region's environment and economy. We support wind projects that have taken the necessary steps for proper siting, developing, operation and maintenance. We feel that the BLM has already rushed ahead, as with the Browns Bench project, by approving projects in inappropriate locations for this type of development. We hope that the Programmatic EIS will help prevent this from happening again.

Responses for Document 80081

80081-001: The PEIS meets the requirements of the CEQ regulations for analysis of alternatives by evaluating a set of alternatives that present a range of options. Scoping was conducted, as required, to identify the range of alternatives to be considered. Comments received during the scoping process did not identify any additional alternatives. Specifically, comments submitted by the Idaho Conservation League did not define an alternative for evaluation; instead, they suggest that a number of things be evaluated to ensure that facilities are properly sited to reduce conflicts with wildlife, recreationists, and communities. The PEIS considers each of those suggestions.

The proposed Wind Energy Development Program would establish policies and BMPs designed to minimize and mitigate the impacts of wind energy development. Evaluation of a "Medium Potential Development Scenario" would be unlikely to result in a different proposed action because the BLM would still seek to develop the best management alternative for wind energy development.

80081-002: The CX identified in the PEIS would be applicable only to site monitoring and testing activities, for authorizations of up to 3 years. The CX specifically requires that the proposal "includes rehabilitation to restore the land to its natural or original condition." If extensive site disturbance is anticipated at a specific location as a result of site monitoring and testing, the CX would not be applicable.

80081-003: As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including the development of an appropriate monitoring program (see Section 2.2.3.2.2, Plan of Development Preparation, General heading, 7th bullet), 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. These consultations will provide an adequate opportunity for assessing the need for and developing requirements for baseline monitoring. Through this process, the BLM will develop project-specific stipulations for incorporation into the POD.

80081-004: The text has been changed to state that avoidance is the preferred mitigation.

Document 80082

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Friday, December 10, 2004 3:57 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80082

CNPS_comment_let
ter_on_Wind_En...

Thank you for your comment, Ileene Anderson.

The comment tracking number that has been assigned to your comment is 80082. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 10, 2004 03:56:39PM CDT

Wind Energy EIS Draft Comment: 80082

First Name: Ileene
Last Name: Anderson
Organization: California Native Plant Society
Address: 2707 K Street
Address 2: Suite 1
City: Sacramento
State: CA
Zip: 95816
Country: USA
Email: ieanderson@cnps.org
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\COLLIER\Desktop\Wind Energy PDEIS\CNPS comment letter on Wind Energy DPEIS.pdf

California Native Plant Society

December 10, 2004

Ray Brady
Wind Energy Programmatic EIS
Argonne National Laboratory EAD/900
9700 South Cass Avenue
Argonne, IL 60439

RE: Comments on the Draft Programmatic Environmental Impact Statement (DPEIS) on wind Energy Development on BLM Lands in the Western United States.

Dear Ray Brady,
The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons and professional botanists organized into 32 chapters throughout California. The mission of the California Native Plant Society is to increase understanding and appreciation of California's native plants and to conserve them and their natural habitats, through education, science, advocacy, horticulture and land stewardship. Our members and chapters work closely with a variety of State and Federal agencies to manage and conserve rare and common botanical resources in California. While our expertise is with the flora of California, the basic principles of our comments are applicable throughout the project area.

The CNPS does not support the development of wind energy projects in Areas of Critical Environmental Concern (ACEC's), because many ACEC's have been identified as areas that are important/essential for maintaining/protecting resources. By eliminating wind energy projects in the ACEC's you prevent the fragmentation that will occur as part of the proposed action. As you know, fragmentation is takes multiple tolls on the integrity of ecosystems (Debinski and Holt 2000, Kruess and Tscharntke 1994, Saunders et al. 1991). Fragmentation is documented to reduce fecundity among herbaceous plant species (Baur and Erhardt 1995), decrease interactions between plants and pollinators (Townsend and Levey 2002), reduce the opportunity for propagules dispersal (Haddad 1999). All of these issues result in reduced genetic variation, and therein the ability of plants (and animals) to adapt to inevitable environmental change (Noss et al. 1997). Coupled with that is the toll that inbreeding takes: reduction in survivorship, fecundity and longevity (Noss et al 1997). 80082-1

In California, many of the ACEC's, especially in relatively new BLM Land Management Plans, are established to maintain ecosystem function, provide refugia for a variety of rare species, and are important conservation components of Habitat Conservation Plans under the Endangered Species Act. Therefore, they must be areas where wind development is precluded. We request that you add ACEC's to the list of specific lands on which wind energy development would not be allowed.

Thank you for the opportunity to submit these comments and we look forward to continued cooperative efforts to maintain the world-class biodiversity of the California Flora on our public lands.

Sincerely

Ileene Anderson
Southern California Regional Botanist
California Native Plant Society
2707 K Street, Suite 1
Sacramento, CA 95816

Dedicated to the preservation of California native flora

cc: CNPS State Office
David Chipping, CNPS Conservation Director

References:

Baur, B. and A. Erhardt. 1995. Habitat Fragmentation and Habitat Alterations: Principal Threats to Most Animal and Plant Species. GAIA 4: 221-226.

Debinski, D.M. and R. D. Holt. 2000. A Survey and Overview of Habitat Fragmentation Experiments. Conservation Biology 14 (2): 342-355.

Haddad, N.M. 1999. Corridor and Distance Effects on Interpatch Movements: a Landscape Experiment with Butterflies. Ecological Applications 9: 612-622.

Kruess A. and T. Tscharntke. 1994. Habitat Fragmentation, Species Loss and Biological Control. Science 264: 1581-1584.

Noss. R., M.A. O'Connell and D.D. Murphy. 1997. The Science of Conservation Planning. Habitat Conservation under the Endangered Species Act. Island Press, Washington DC.

Saunders, D.A, R.J. Hobbs, and C.R. Margules. 1991. Biological Consequences of Ecosystem Fragmentation: A Review. Conservation Biology 5: 18-32

Towsend, Patricia A. and Douglas J. Levey. 2002. Effect Of Habitat Corridors On Plant-Pollinator Interactions. Society for Conservation Biology 16th Annual Meeting – Planning and Reserve Design Session. July 18 2002

Response for Document 80082

80082-001: The BLM acknowledges the role and importance of habitat fragmentation on ecological resources and the need to avoid wind energy development in areas where it would be incompatible with specific resource values. The Wind Energy Development Program proposed policies specify that the BLM will not issue ROW authorizations for wind energy development on lands that are incompatible with such values, and these lands include ACECs (see Section 2.2.3.1).

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 that will aid in the identification of potential exclusion areas will be conducted for any proposed project on BLM-administered lands. The scope and approach 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 stipulations for incorporation into the POD. The identification of site-specific exclusion areas is beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

Document 80083

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Friday, December 10, 2004 4:12 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80083

wind_farm_DEIS_cmt_80083.doc (...

Thank you for your comment, Doug Heiken.

The comment tracking number that has been assigned to your comment is 80083. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 10, 2004 04:11:19PM CDT

Wind Energy EIS Draft Comment: 80083

First Name: Doug
Last Name: Heiken
Organization: Oregon Natural Resources Council
Address: PO Box 11648
City: Eugene
State: OR
Zip: 97440
Country: USA
Email: onrcdoug@efn.org
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Doug Heiken\My Documents\!nSnych\Comments\BLM comments\wind farm DEIS cmt.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.

DATE: 10 December 2004

FROM:
Oregon Natural Resources Council
PO Box 11648
Eugene OR 97440
541-344-0675

Klamath-Siskiyou Wildlands Center
PO Box 102
Ashland OR 97520
541-488-5789

TO:
BLM Wind Energy Programmatic EIS Scoping
Argonne Nat'l Lab EAD/900
9700 S. Cass Ave.
Argonne IL 60439
Fax 866-542-5903
http://windeis.anl.gov/involve/comments/index.cfm

Subject: Comments on Wind Energy Programmatic DEIS

Dear BLM:

Please accept the following comments from Oregon Natural Resources Council (ONRC) and Klamath Siskiyou Wildlands Center (KSWC) concerning the programmatic DEIS for wind energy development on public lands in the western U.S. ONRC represents over 7,000 members who support our mission to protect and restore Oregon's wildlands, wildlife, and waters as an enduring legacy. We seek to permanently protect Oregon wild forests, protect and restore essential habitat for native species, and protect and restore the Klamath Basin from the headwaters to the sea. ONRC has been extensively involved in efforts to inventory BLM and Forest Service roadless areas so they can be conserved and protected as wilderness someday.

ONRC's main concerns are:

0. The BLM should use the EIS process to adopt concrete and enforceable mitigation requirements that are known to reduce impacts of wind projects on wildlife, water quality, roadless/wilderness areas, scenic values, native plant habitat, etc. 80083-1

1. LET'S START WITH A COMPREHENSIVE NATIONAL ENERGY POLICY: This EIS should be deferred until the government first prepares an EIS for a sensible national energy policy. ONRC supports sustainable energy development, but it needs to be in a context of sound planning and foresight. In that regard, energy conservation should be the highest priority. New production can be considered, but wind power is not without serious environmental impacts and must be very carefully considered and appropriately limited. 80083-2

ONRC and KSWC strongly support conservation and alternative energy development. Less dependence on fossil fuels generally and foreign oil can help the global climate and help avoid unnecessary spilling of blood for oil. Wind energy projects that are carefully located and carefully designed can be a small part of the overall energy policy. 80083-2 (cont.)

2. ROADLESS AREAS: Areas of public lands without roads have special characteristics that must be given special consideration in the EIS. Unroaded areas greater than about 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 294.11—

> *Roadless area characteristics.* Resources or features that are often present in and characterize inventoried roadless areas, including:
> (1) High quality or undisturbed soil, water, and air;
> (2) Sources of public drinking water;
> (3) Diversity of plant and animal communities;
> (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land; 80083-3
> (5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
> (6) Reference landscapes;
> (7) Natural appearing landscapes with high scenic quality;
> (8) Traditional cultural properties and sacred sites; and
> (9) Other locally identified unique characteristics.

Wind projects require roads and permanent modification of the environment in ways that conflict with roadless values. One of the BMPs should be an exclusion of wind projects form roadless areas >1,000 acres.

3. AVOID 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, Siskiyou Mtns, Winter Rim, all designated wilderness areas, wilderness study areas, Coast Range ridge tops, and roadless areas >1,000 acres. 80083-4

4. 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.

   a. Please do not allow wind development in bird migration corridors.
   b. Areas of low visibility such as the foggy south coast of Oregon should also be avoided. 80083-5
   c. Areas where prey species occur should also be avoided to prevent attracting birds of prey into turbine danger zones.
   d. Leks and other sage grouse habitat must be avoided, because these birds avoid areas with trees and other large vertical structures.
   e. Do not build fences because they will harm birds and other wildlife.

DEIS page 5-57 estimates "33,000 bird fatalities per year from the estimated 15,000 operating wind turbines." This seems like an exceedingly low estimate. Is this based exclusively on direct evidence of mortality, or does this estimate account for birds that might collide with the towers and fall too far from the towers to be readily counted? What about birds that die and are picked up by scavengers before they are counted?

The DEIS also uses a crude and insensitive indicator of bird-turbine conflicts, i.e., based solely on the number of turbines. The FEIS should add factors to account for the location of the turbines with respect to migration corridors and regions of low visibility (fog), and the design of the turbines and towers and lights. Also, please clearly distinguish between birds species such as native seabirds and raptors vs. starlings and Asian rock doves. 80083-5 (cont.)

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 typically 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 meadow areas often located on and near ridge-tops in forested areas, and the rock formations often located near ridge-tops in eastern Oregon.

5. BAT MORTALITY: Bats use ridge tops disproportionately for both roosting and travel. As a group, bats are a declining resource that play critical ecological roles such as insect control. The EIS must explain the impacts to bats on a species-specific basis. Some ground-roosting or ground-foraging bats will also be adversely affected by wind developments.

   Bats sometimes use crevices in the ground to roost. Wind projects should avoid rocky areas with suitable crevices in known bat habitat and bat surveys should be required before wind projects are approved. Bats also forage in meadows in forested areas, so wind projects should avoid forest meadows often located on ridgetops in Oregon. 80083-6

6. TOWER LIGHTING: Lights are thought to be an attractant to migratory birds that causes increase mortality. The adopted BMPs should require short towers that do not trigger FAA lighting requirements. 80083-7

7. WILDLIFE DISTURBANCE: The EIS should consider how wind farms will displace wildlife through industrialization of remote areas formerly used mostly by wildlife. 80083-8

8. INVASIVE WEEDS: Construction, roads, power line right-of-ways will all cause extensive ground disturbance and act as a vector for invasive plant species. Weeds are a "slow motion explosion" that will be one of the biggest environmental problems of the future. Since wind farms will be located in windy sites, weeds that are wind-dispersed, and there are many will be a particularly serious concern. 80083-9

9. SERVICE ROADS: Roads constructed and maintained to facilitate wind energy development will cause serious adverse impacts including: 80083-10

a. Hydrology— converting subsurface to surface flow and increasing peak storm flows;

b. Erosion/Sedimentation— ditches and road surfaces are subject in mobilizing soil particles and delivering them to streams;

c. Weeds— continuous disturbance and linear topology means that road are serious weed vectors; native plant communities will altered;

d. Habitat— wildlife will be disturbed and displaced;

e. Soils— compaction and displacement reduce soil productivity and act as a barrier to movement of subterranean wildlife;

f. Disease— wind development, especially roads, in SW Oregon will spread *Phytophthora lateralis*, a root disease which is fatal to rare and endemic Port Orford Cedar trees.

80083-10 (cont.)

10. SCENIC IMPACTS: Ridge top locations are often visible for tens of miles. Scenic impairment as observed from roadless area and wilderness areas, recreation areas, and scenic highways are of special concern. 80083-11

11. TRANSMISSION CORRIDORS: Construction of transmission corridors necessary to connect wind farms to the existing grid will require, roads, ground disturbance, scenic blight, and exacerbate all of the above effects and must be considered as a connected and cumulative impact of wind farms. 80083-12

12. FIRE: There is a well- recognized need to restore fire to the western landscapes. The presence of wind farms will make fire restoration more difficult or impossible. The EIS must address this conflict. The discussion of fire on pages 5-52 and 5-53 mention that fire frequency has increased thereby contributing to the cheatgrasss problem. While this phenomena is true, the DEIS fails to recognized that there are other parts of the west that are experiencing less frequent fire due to human fire suppression efforts. There is a need to reintroduce fire in many areas and building wind farms could put valuable infrastructure in the path of prescribed fire. We can't let wind farms stand in the way of restoration of natural fire regimes. The DEIS should discuss how this conflict will be mitigated. 80083-13

13. ECONOMIC FACTORS: Please disclose and consider economic factors including:
    a. the future price of electric power;
    b. the wide range alternative ways that future demand might be met, including investments in energy conservation. 80083-14

14. OFFSHORE ISSUES: As Jane Lubchenko has observed, "our oceans are in crisis." Any offshore wind developments should be developed only after a fully functional set of marine reserves are established to conserve bird, fish, and other marine species. 80083-15

15. CONCRETE AND ENFORCEABLE STANDARDS: All the above issues must be carefully considered in the programmatic EIS. The EIS should propose concrete and enforceable standards to ensure that the values recognized above are conserved and protected. 80083-16

16. LEGAL REQUIREMENTS: Please disclose and consider the full suite of legal requirements such as FLPMA, ESA, MBTA, CWA, and resource management plans, including the Northwest Forest Plan. Do not amend any Standards & Guideline of the 80083-17

Northwest Forest Plan. The Northwest Forest Plan is the bare minimum legal protection for several listed and special status species. Any reduction in protection for old-growth or aquatic species would require consideration within the context of the entire Northwest Forest Plan.

80083-17 (cont.)

Sincerely,

/s/

Doug Heiken

Responses for Document 80083

80083-001: The Wind Energy Development Program proposed policies and BMPs, as listed in the Final PEIS, establish concrete minimum mitigation standards. The language on these proposed policies and BMPs has been reworded in the Final PEIS to indicate that these policies and BMPs are required, not suggested, elements of any wind energy development activity on BLM-administered land.

Operators will be required to comply with the terms and conditions of the ROW authorization. The POD, containing project-specific stipulations (including required mitigation measures), will be appended to the ROW agreement. Failure to comply could result in termination of the ROW authorization.

80083-002: Your comment addresses issues that are beyond the scope of the PEIS, the mission and responsibilities of the BLM, and/or the defined programmatic scope of the proposed Wind Energy Development Program. We appreciate your input and participation in the public review process.

80083-003: Items (1) – (8). 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 proposed polices and BMPs in Section 2.2.3.1, Proposed Policies, and Section 2.2.3.2, Proposed BMPs, ensure adequate consideration of the resources identified in these items and must be applied to all wind energy development projects on BLM-administered land. 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.

Item (9) and Last Paragraph. 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. These processes will provide adequate opportunity for identification of local exclusion areas and areas with unique characteristics. 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.

80083-004: 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.

80083-005: 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 that indicates that avian mortality does occur at wind facilities. The PEIS does discuss impacts to raptors, a group that has been shown to be particularly impacted by wind facilities.

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) to be incorporated into the POD for any wind energy project proposed for BLM-administered lands. As required by the Wind Energy Development Program proposed 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.

Text has been added to indicate that because of different study designs, the results are not necessarily comparable across facilities and may be underestimating actual mortality levels. However, it is also important to note that regardless of the differences in facility design, size, and siting, and potential monitoring design differences, the data to date do not indicate continual, large-scale mortalities or population-level effects.

80083-006: The PEIS presents potential impacts to biota and habitats that may be incurred as a result of wind energy development on BLM-administered lands. Because of the great diversity of habitats, species, and environmental conditions that are found on BLM-administered lands in the 11 western states encompassed by this programmatic EIS, species-specific impact analyses are not possible. As required by the Wind Energy Development Program proposed policies and BMPs, site- and species-specific analyses will be conducted for any proposed project on 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. Exclusions of specific habitats and wildlife use areas from wind energy development will also be determined at the project level as part of the species- and site-specific analyses, or through local land use planning efforts with opportunities for full public involvement. Through this process, the BLM will develop

project-specific design, siting, and monitoring stipulations for incorporation into the POD. Site- and species- specific analyses are beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

80083-007: The intent of the BLM is to not place restrictions on development on the basis of design features in this PEIS. Design criteria will be evaluated at the project level to address issues such as potential impacts to migratory birds.

80083-008: Section 5.9.3.2.6 of the PEIS discusses potential impacts to wildlife from increased access to surrounding lands.

80083-009: As required by the Wind Energy Development Program proposed policies and BMPs, operators are required to develop a plan for the control of noxious weeds and invasive species. The development of these plans will occur at the site-specific level and are beyond the scope of the PEIS.

80083-010: The Wind Energy Development Program includes a BMP that requires the development of a road siting and management plan that incorporates existing BLM standards regarding road design, construction, and maintenance (see Section 2.2.3.2.2).

In addition, the Wind Energy Development Program proposed policies and BMPs require that site- and species- specific evaluations be conducted for any wind energy project proposed for BLM-administered lands. The intent of these evaluations is to identify siting, design, and operational stipulations that would avoid, minimize, or mitigate potential impacts to hydrology, water quality, wildlife, and other resources. The policies and BMPs also require that noxious weed and invasive species control plans be developed for any proposed wind energy development. The scope, approach, and details of these evaluations and plans 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 operation stipulations for incorporation into the POD.

No text change has been made to the document in response to your comment.

80083-011: Such concerns would be addressed during site-specific evaluations, determined through input from other federal, state, and local agencies, and interested stakeholders.

80083-012: Section 6.4.3 acknowledges that wind energy development on BLM-administered lands may require the construction of new transmission lines. Such construction is considered to be a separate but related activity and will 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.

80083-013: 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 evaluations of the compatibility of a wind energy project with fire regime restoration activities, 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. No text change has been made to the document in response to your comment.

80083-014: As is stated in the Executive Summary (page ES-1) and in Chapter 1 of the PEIS, the purpose of the PEIS is "to assess the environmental, social, and economic impacts of wind energy development on BLM-administered land." A cost-benefit analysis of wind energy development would likely have included a regional analysis of the comparative economic and environmental costs of wind energy development compared with other forms of electricity generation, and conservation measures. Such an analysis would likely also have included impacts of wind development on fossil fuel consumption, land and water resources, and emissions from conventional power plants. Although the analysis undertaken for the PEIS used a wind development scenario that takes into account some of these factors, in particular power generation capital costs, fossil fuel prices, and transmission systems issues, the analysis is limited specifically to those environmental and economic impacts that result from wind energy developments on BLM-administered land. The analysis of impacts on comparative power generation costs, and environmental and economic impacts that emanate from other forms of electricity generation are beyond the scope of the analysis undertaken for the PEIS.

80083-015: Your comment addresses issues that are beyond the scope of the PEIS, the mission and responsibilities of the BLM, and/or the defined programmatic scope of the proposed Wind Energy Development Program. We appreciate your input and participation in the public review process.

80083-016: The Wind Energy Development Program proposed policies and BMPs, as listed in the Final PEIS, establish concrete minimum mitigation standards. These proposed policies and BMPs have been reworded in the Final PEIS to make them required elements of any wind energy development activity on BLM-administered land.

Operators will be required to comply with the terms and conditions of the ROW authorization. The POD, containing project-specific stipulations (including required mitigation measures), will be appended to the ROW agreement. Failure to comply could result in termination of the ROW authorization.

80083-017: The FLPMA applies to all public lands, including those covered under the Oregon and California Grant Lands Act of 1937 (O&C Act) (43 USC 1702). The proposed amendments to BLM land use plans in Oregon and Washington, listed in Appendix C, neither authorize nor suggest any amendment or compromise of the Northwest Forest Plan. In addition, Appendix E already includes the FLPMA, the CWA, the MBTA, and the ESA. However, Table E-2 has been revised to add the O&C Act and the Northwest Forest Plan, as a special policy overlay developed by Presidential direction.

Document 80085

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Friday, December 10, 2004 4:45 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80085

Thank you for your comment, Ken Crane.

The comment tracking number that has been assigned to your comment is 80085. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 10, 2004 04:44:29PM CDT

Wind Energy EIS Draft Comment: 80085

First Name: Ken
Last Name: Crane
Organization: Idaho Department of Agriculture
Address: PO Box 7249
City: Boise
State: ID
Zip: 83707
Country: USA
Email: kcrane@agri.state.id.us
Privacy Preference: Don't withhold name or address from public record

STATE OF IDAHO

DIRK KEMPTHORNE
Governor
PATRICK A. TAKASUGI
Director

DEPARTMENT OF AGRICULTURE
DIVISION OF ANIMAL INDUSTRIES

2270 Old Penitentiary Rd.
P.O. Box 7249
Boise, Idaho 83707

(208) 332-8540

December 3, 2004

BLM Wind Energy Programmatic EIS
Argonne National Laboratory, EAD/900
9700 S. Cass Avenue
Argonne, IL 60439

Re: Comments on the Draft Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States

The Idaho State Department of Agriculture (ISDA) appreciates the opportunity to comment on the Draft Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States (DEIS). One of the primary goals of the Rangeland Management Program of the ISDA is to provide support and expertise to Idaho livestock producers in rangeland planning and practices on both state and federal lands. Our comments are directed to this end; to ensure the best available range science is used as related to wind energy development and the development of the Final EIS.

In general, the DEIS is a thorough evaluation of the environmental impacts of wind energy development. There are some revisions and additions ISDA proposes the Bureau of Land Management (BLM) make to the DEIS that fall within the scope of the proposed action.

Chapter 2: Proposed Action and Alternatives

2.2.3.1 Proposed Policies

ISDA is pleased to see that under the proposed policies section, livestock grazing is included in the list of land use practices that will, to the extent possible, not be prevented by wind energy projects. We also appreciate the BLM's willingness to "incorporate management goals and objectives specific to habitat conservation" for the potential impacts wind energy projects may have on sage-grouse habitat, as well as other species of concern. Sage-grouse habitat management and livestock grazing are at the forefront of the current range issues and will be addressed later in this letter. 80085-1

2.2.3.2.2 Plan of Development Preparation

ISDA endorses the DEIS's incorporation of adaptive management strategies in the monitoring program and Best Management Practices (BMPs) for the proposed action. This will give the BLM the necessary flexibility if management strategies need to be changed. However, the DEIS does not specify a time frame for how long these monitoring programs will need to continue into each project. The language used, such as "environmental conditions" and "each environmental resource" is also vague in what the monitoring plan will be required to monitor. We recommend giving a specific length of time monitoring should occur, and identify which "conditions" and "resources" should be monitored, in order to avoid confusion in the Final EIS. Specific, comprehensive-monitoring plans will be critical in measuring the success of habitat restoration efforts following disturbances. 80085-2

We support the BLM's proposed BMPs for the proposed action to minimize potential adverse impacts of wind energy development, especially the incorporation of "scientifically rigorous avian…surveys." We also endorse the designs of facilities to reduce perching and nesting by raptors and ravens in order to mitigate predation on sage-grouse. 80085-3

The BMPs for noxious weeds and pesticides are incomplete. The DEIS, under the sub-heading "Noxious Weeds and Pesticides," states, "Operators should develop a plan for control of noxious weeds and invasive species, which could occur as a result of new surface disturbance activities *at the site*." (Italics added for emphasis) IDSA feels operators must be required to develop a plan to control weeds resulting from new project activities. New infestations of invasive species have great potential to negatively affect the resource and plans must be in place for immediate control. Additionally, this statement does not recognize the possibility of new infestations from disturbances away from the site, such as new roads and transmission line right-of-ways (ROWs). ISDA recommends that this BMP recognize the possibility of new weed infestations on newly constructed roads and ROWs. Also, vehicles and other construction equipment should not only be washed prior to arrival at the project site, as outlined in the BMP, but after leaving the site, too, if noxious weeds are present. The principles of Integrated Weed Management (IWM) should also be incorporated into the BMP's. IWM will be discussed in more detail below. 80085-4

2.2.3.2.3 Construction

ISDA supports the BLM's plan to use weed-free grasses, forbs, and shrubs in all areas of disturbed soil. 80085-5

Chapter 4: Affected Environment

4.3.2 Surface Water

The Programmatic Draft DEIS states, "The presence of both permanent and ephemeral surface water bodies would need to be assessed at the project level, along with…water use by both humans and wildlife…" This statement neglects to mention livestock as water users. Permanent and ephemeral surface water bodies on BLM land are critical to livestock management and distribution and must be recognized as such in the Final EIS. 80085-6

4.7.1 Management of BLM-Administered Lands

ISDA is concerned about the lack of attention the DEIS gives to livestock grazing as a major use of BLM land. The first sentence of this section only mentions, "cattle grazing" while not recognizing other types of livestock grazing. We suggest changing the phrase to read, "livestock grazing." 80085-7

Also, when listing BLM's management responsibilities under the multiple-use framework, livestock grazing isn't included with energy and mineral development, and timber sales as a commercial activity. The BLM administers 18,000 grazing permits on 160 million acres of its land. Grazing should receive more attention and be listed with the other commercial activities because its prominence as a major use of public lands. 80085-8

5.9.2.1.1 Direct Injury of Loss during Clearing, Grading, and Facility Construction

This section is somewhat confusing as it contradicts itself with two different claims. The DEIS states, "Impacts to vegetation along transmission lines and staging areas would be temporary, with vegetation expected to regenerate following completion of construction activities." The last sentence of this section then says, "Nevertheless, it could take several years for temporarily affected areas to recover…and some types of habitat *may never fully recover from disturbances*." (Italics added for emphasis) Please clarify exactly what type of impacts these temporary activities will have on soil and vegetation. 80085-9

5.9.2.1.4 Introduction of Invasive Species

ISDA appreciates the BLM's attention to the potential problems invasive vegetation will present as a result of construction activities associated with wind energy development. However, the list of adverse effects from invasive species is incomplete as are the mitigation measures outlined. 80085-10

The BLM must analyze the potential negative impacts of wildfire due to increased invasive species in disturbed areas. Wildfire and conversion of native shrub-steppe ranges to annual grasses are listed as the primary threats to a number of sensitive plant and animal species. Failure to address this issue would be a significant over-site.

Another adverse affect of invasive species is economic in nature. ISDA estimates the direct cost of noxious weeds on Idaho's public and private lands at an annual amount of $300 million. Unsuccessful mitigation of new invasive vegetation species infestations will increase these costs. 80085-11

The DEIS recognizes that "establishment of invasive vegetation may be limited by early detection and subsequent eradication of the plants." Early detection, however, is only one part of Integrated Weed Management (IWM). ISDA supports and recommends integrating the use of IWM into the mitigation measures for invasive vegetation in the DEIS. IWM is the use of all available and feasible weed control techniques in an organized, coordinated, and mutually supportive manner. Idaho's Strategic Plan for Managing Noxious Weeds states:

"[IWM] is the best method for reducing the ecological, economic and social impacts of noxious weed on the state's human and natural resources. To accomplish this, the supporters and cooperators will incorporate resources, priorities and strategies of federal, state, and county agencies into a unified approach to halt or slow the spread of noxious weeds across Idaho (pp. 3-4)." 80085-12

The IWM principles should also be incorporated into the BMPs as outlined in Chapter 2.

5.9 Ecological Resources

Pg. 5-72 Compatibility of a Wind Energy Development Project and Gallinaceous Birds

Though the DEIS does acknowledge that energy-related facilities should be located away from active leks and sage-grouse habitat, when possible, there is not a specific distance mentioned. ISDA recommends incorporating the recommendations in Connelly et al. (2000) that energy related facilities should be located greater than 3.2 km from active leks whenever possible. 80085-13

ISDA also believes that the suggested mitigation measures are lacking in protecting sage-grouse against any adverse impacts from wind energy development. Except for the very general BMP guidelines to develop a monitoring plan in Chapter 2, there are no specific measures within the DEIS to monitor sage-grouse population and habitat vegetation when sage-grouse habitat is disturbed through development. Monitoring should be a critical component of the mitigation measures, especially at the project site, and where new roads and ROWs are constructed. Monitoring should also occur in areas that are rehabilitated, and where mitigation measures take place at off-site locations to offset unavoidable sage-grouse habitat alteration and reduction at the project site. This recommendation is supported by the U.S. Fish and Wildlife Service (2003). Specific monitoring schemes should be incorporated into the adopted adaptive management strategies regarding wind energy development as outlined in section 6.1.2 of the DEIS. 80085-14

5.9.5 Mitigation Measures

The DEIS does not adequately address mitigation measures for the impact of OHV use.

As properly acknowledged in section 6.4.1.10 of the DEIS, OHV use will increase in wind energy development project areas, especially when new access roads and transmission line ROWs are built and maintained. The presence of OHVs will increase the spread of noxious weeds, disturbance to wildlife, potential increase in fire starts, and soil compaction and erosion. With the increased OHV use, it will be difficult for ranchers with livestock grazing permits to follow their livestock management plans, through gates being left open, fences cut, and livestock harassed. 80085-15

ISDA recommends the BLM acknowledge these impacts in the Final EIS and develop measures to mitigate OHV use in these areas. For example, signing, gating, and increased enforcement.

5.9.5.3.5 Mitigating Establishment of Invasive Vegetation

This section, as well as all other phases of wind energy development, should include the Integrated Weed Management (IWM) principles as outlined above. 80085-16

Aside from inspecting and cleaning construction equipment that may have entered invasive species infestations, all personnel vehicles, shoes, and clothing should be inspected and cleaned as well.

5.10 Land Use

In this section, there is a lack of discussion on the impacts, both direct and cumulative, that wind energy development can have on livestock grazing on BLM administered lands. ISDA understands that wind energy, in the long term, may create only a small ecological footprint and can be compatible with land uses such as livestock grazing, however, we believe that it could potentially have a much larger impact than the DEIS acknowledges.

The DEIS assumes that for each wind turbine tower, only an acre or less of land is impacted. The DEIS does not take into consideration new or improved roads and it assumes that habitat disturbed during construction will be rehabilitated successfully. New roads and failed rehabilitation projects will permanently reduce the forage base on BLM grazing allotments. In the example given in the DEIS on pg. 5-85, only 118 out of 7,000 acres of rangeland in the project area were permanently impacted. This example does not break down the impacts on a per allotment basis. 188 acres of forage lost on a grazing allotment of less than 7,000 acres could have a significant impact on how that allotment is managed; especially if the acreage of lost forage due to new roads and failed restoration projects are taken into consideration. Additionally, there is no analysis of the potential increase in fire starts and subsequent loss of forage and disruption of grazing allotment management. These impacts should be acknowledged in the Final EIS. 80085-17

On pg. 5.57, the DEIS acknowledges that cattle will cluster around turbines. The DEIS does not take into account the impact this could have on management of grazing allotments and the subsequent costs that may be incurred because of it. In order to keep livestock from congregating around the towers, new range improvements may need to be built, such as fences. Or, the permittee may need to employ additional help in herding livestock away from turbines to keep them from overgrazing the area. ISDA recommends the BLM acknowledge the potential increased cost that ranchers may incur because of wind energy development and the potential impacts from cattle that cluster around turbines in the Final EIS. 80085-18

Chapter 6: Analysis of the Proposed Action and Its Alternatives

6.4 Cumulative Impacts

The DEIS, in this section, acknowledges that land uses like livestock grazing "...would generally be compatible..." The DEIS, however, fails to recognize some important cumulative impacts that wind energy development could potentially have on livestock grazing on public lands.

Livestock management has already changed significantly on public lands because of the decline in sage-grouse populations. Ranchers have made major concessions and have incurred substantial costs in changing their operations in order to better preserve sage-grouse populations and habitat. This has happened in spite of the lack of direct evidence that livestock have contributed to sage grouse population decline (Connelly et al. 2000). For example, ranchers have had to invest in new fences and have changed grazing systems in order to better protect breeding and brood-rearing sage-grouse habitat. 80085-19

Sage grouse need large tracts of contiguous, undisturbed areas of high-quality habitat during their four distinct seasonal periods. Wind turbines energy development, as acknowledged in the DEIS, could have a potential impact on sage-grouse populations by fragmenting these large tracts of habitat through increased presence of invasive species, increased incidence of wildfire, and increased human activity. More research is needed to determine the impact wind energy development will have on sage-grouse (USFWS 2003). If sage-grouse habitat is altered by wind energy development, the trickle-down effect will require ranchers who hold BLM grazing permits to make even more concessions and will incur greater operating costs. The BLM must recognize these cumulative impacts in the Final EIS.

80085-19 (cont.)

Again, we appreciate the opportunity to provide comments and suggestions to the DEIS. If there are any questions, please feel free to contact Kevin Wright at (208) 736-3073.

Sincerely,

John Chatburn
Deputy Administrator
Division of Animal Industries
ISDA

Literature Cited

Connelly, J.W., et al., 2000, "Guidelines to Manage Sage Grouse Populations and Their Habitats," *Wildlife Society Bulletin* 28(4):967985.

USFWS (U.S. Fish and Wildlife Service), 2003a, *Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines*, U.S. Department of the Interior, Wind Turbine Siting Working Group, Washington, D.C. Available at http://www.fws.gov/r9dhcbfa/wind.pdf. Accessed October 29, 2004.

Responses for Document 80085

80085-001: Thank you for your comment. We appreciate your input and participation in the public review process.

80085-002: 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. The site-specific analyses will address which resources and conditions should be monitored at a given site, as well as appropriate monitoring time frames.

80085-003: Thank you for your comment.

80085-004: The language on the Wind Energy Development Program proposed policies and BMPs has been reworded in the Final PEIS to indicate that these policies and BMPs are required, not suggested, elements of any wind energy development activity on BLM-administered land. The BMPs require development of a noxious weed and invasive species control plan and an integrated pest management plan for any wind energy project proposed for BLM-administered lands, and these plans would apply to all project-related activities, including new access roads and transmission line ROWs. The methods and tools specified in the plans 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 noxious weed and pesticide use plans stipulations for incorporation into the POD. Site-specific details for these plans are beyond the scope of the PEIS.

80085-005: Thank you for your comment.

80085-006: The text has been revised to specify use by humans, livestock, and wildlife.

80085-007: The suggested editorial change has been made.

80085-008: Livestock grazing has been added to the list of commercial activities under BLM's multiple use framework in Section 4.7.1. Livestock grazing is one of the commercial use activities included in Table 4.7.1-2.

80085-009: The types of impacts would be the destruction and injury of vegetation, and habitat reduction or degredation. These impacts are discussed in the text in Section 5.9.2.1 and identified in Table 5.9.2-1. No text change has been made to the document in response to your comment.

80085-010: The PEIS discusses the potential impacts of fire on vegetation and wildlife in Sections 5.9.3.1.6 and 5.9.3.2.8, respectively. No text change has been made to the document in response to your comment.

80085-011: As required by the Wind Energy Development Program proposed policies and BMPs, site-specific plans for the control of noxious weeds and invasive species will be required for all wind energy development projects proposed for BLM-administered lands. The scope and approach for these plans 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. The description of site-specific plans is beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

80085-012: As required by the Wind Energy Development Program proposed policies and BMPs, plans for controlling noxious weeds and invasive species will be required for any wind energy development project proposed for BLM-administered lands. The scope and approach for this 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 noxious weed and invasive species control plan stipulations for incorporation into the POD. Because the Wind Energy Development Program proposed in this document would apply to BLM-administered lands in 11 western states, it would be inappropriate to specify an individual state's requirements for the entire program. As stated above, individual state programs would be considered on a site- by-site basis as appropriate. No text change has been made to the document in response to your comment.

80085-013: The identification of specific buffer zones will be developed at the project level as part of the site-specific analyses. As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including the development of specific buffer areas, will be conducted for any proposed project on BLM- administered lands. The need for and specifications of any buffer zones will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. The specification of buffer zone dimensions is beyond the scope of the PEIS.

80085-014: As required by the Wind Energy Development Program proposed policies and BMPs, species-specific analyses, including monitoring programs, will be conducted for any proposed wind energy 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. Regarding sage-grouse species,

existing BLM guidance on the management of sage-grouse and sage-grouse habitat will be incorporated into local, site-specific analyses. Site-specific analyses are beyond the scope of the PEIS.

80085-015: 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 issues associated with potential increased OHV use in the vicinity of the project would be identified and addressed as part of the site-specific analyses.

80085-016: As required by the Wind Energy Development Program proposed policies and BMPs, noxious weed and invasive species control plans will be required for any wind energy project proposed for BLM-administered lands. The scope and methods identified in these plans 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, project-specific control plans will be developed for incorporation into the POD. While the BMPs discuss some general measures such as vehicle cleaning, detailed descriptions of the measures to be included in the control plans are beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

80085-017: As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses (including impacts on livestock grazing) 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. As appropriate, stakeholders would include those individuals holding leases for grazing allotments. Site-specific analyses are beyond the scope of the PEIS.

80085-018: Generally, clustering around structures by livestock (or wildlife) is for relief from heat, inclement weather events, or insects. There is no evidence that livestock will overgraze the areas immediately around turbines. No text change has been made to the document in response to your comment.

80085-019: 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. Additional analyses of the short-term and long-term cumulative impacts on livestock grazing and habitat alteration for sensitive species such as the sage-grouse may be necessary for some sites.

Document 80086

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Friday, December 10, 2004 5:11 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80086

Kristi_DuBois_wind_comments_80...

Thank you for your comment, Kristi DuBois.

The comment tracking number that has been assigned to your comment is 80086. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 10, 2004 05:11:06PM CDT

Wind Energy EIS Draft Comment: 80086

First Name: Kristi
Middle Initial: L
Last Name: DuBois
Address: 2523 Klondike Ct
City: Missoula
State: MT
Zip: 59808
Country: USA
Email: kdubois@montana.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Kristi DuBois\Desktop\Kristi DuBois 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.