

Document 80041**WindEISArchives**

From: windeiswebmaster@anl.gov
Sent: Friday, December 03, 2004 6:00 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80041

Thank you for your comment, Tolford Young.

The comment tracking number that has been assigned to your comment is 80041. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 3, 2004 05:59:34PM CDT

Wind Energy EIS Draft Comment: 80041

First Name: Tolford
Middle Initial: R
Last Name: Young
Address: 3260 E. Wasatch Pines Lane
City: Granite
State: UT
Zip: 84092-4212
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I want to be on record as supportive of the "Proposed Action" of this PEIS for all the reasons for which it was proposed.

| 80041-1

Good work, neighbors!

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 80041

80041-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80042

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Sunday, December 05, 2004 4:26 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80042

Thank you for your comment, Chiara Cannella.

The comment tracking number that has been assigned to your comment is 80042. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 5, 2004 04:25:48PM CDT

Wind Energy EIS Draft Comment: 80042

First Name: Chiara
Middle Initial: M
Last Name: Cannella
Address: #####
City: #####
State: ##
Zip: #####
Country: USA
Privacy Preference: Withhold address only from public record

Comment Submitted:

I am extremely opposed to this proposal because of environmental affects, and the destruction of important lands.

Other, less destructive energy alternatives should be considered instead.

80042-1

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 80042

80042-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80043

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Monday, December 06, 2004 7:46 AM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80043

Thank you for your comment, #####

The comment tracking number that has been assigned to your comment is 80043. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 6, 2004 07:45:42AM CDT

Wind Energy EIS Draft Comment: 80043

First Name: #####
 Last Name: #####
 Address: #####
 City: #####
 State: ##
 Zip: #####
 Country: USA
 Privacy Preference: Withhold name and address from public record

Comment Submitted:

Whats wrong with more solar enegy as well as wind.
 Spend more on the use of the sun as well as wind.
 I think we as a nation had better be more contained & self suporting where enegy is concerned.

| 80043-1

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 80043

80043-001: As stated in Chapter 1, the National Energy Policy recommends that the Department of the Interior work with other federal agencies to increase renewable energy production on public lands. The BLM has focused on wind energy development in this PEIS, in part, in response to the number of ROW applications it has received. The BLM issued a policy designed to encourage solar power development on public lands in October 2004; information about this policy can be obtained at http://www.blm.gov/nhp/news/releases/pages/2004/pr041021_solar.htm.

Document 80045**WindEISArchives**

From: windeiswebmaster@anl.gov
Sent: Monday, December 06, 2004 4:37 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80045



Wind_Development
_Draft_Program...

Thank you for your comment, Mark Watson.

The comment tracking number that has been assigned to your comment is 80045. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 6, 2004 04:36:59PM CDT

Wind Energy EIS Draft Comment: 80045

First Name: Mark
Middle Initial: L
Last Name: Watson
Organization: New Mexico Department of Game and Fish
Address: P.O. Box 25112
City: Santa Fe
State: NM
Zip: 87504
Country: USA
Email: mwatson@state.nm.us
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\mwatson\My Documents\Federal Agencies\BLM\Wind\Wind Development Draft Programmatic EIS.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.

GOVERNOR
Bill Richardson



DIRECTOR AND SECRETARY
TO THE COMMISSION
Bruce C. Thompson

STATE OF NEW MEXICO
DEPARTMENT OF GAME & FISH

One Wildlife Way
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Visit our website at www.wildlife.state.nm.us
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Santa Fe, NM

Jennifer Atchley Montoya
Las Cruces, NM

Peter Pino
Zia Pueblo, NM

Dr. Tom Arvas
Albuquerque, NM

Leo Sims
Hobbs, NM

December 5, 2004

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

Re: Draft Programmatic Environmental Impact Statement on Wind Energy Development
on BLM-Administered Lands in the Western United States
NMGF Doc. No. 9591

Dear Sirs:

The New Mexico Department of Game and Fish (Department) has reviewed the Programmatic Environmental Impact Statement (PEIS) on Wind Energy Development on BLM-Administered Lands in the Western United States. The Department commented on 16 December 2003 on the Notice of Intent that announced the development of this PEIS. In those comments, we identified our concerns with the potential for large industrial wind turbine development projects to adversely impact 1) wildlife, such as night-migrating birds, raptors, and bats; and 2) important wildlife habitats, such as wetlands, waterways and migration corridors for birds and bats. We have attached a copy of those comments for your additional review.

The PEIS is thorough, well written and well documented. We are pleased to see that the issues we brought up in our previous comments are addressed as possible mitigation measures for wind development projects on western BLM lands. We recognize that these mitigation measures will need to be incorporated as best management practices (BMPs), stipulations and standards and guidelines in future Resource Management Plan amendments for New Mexico BLM Districts to authorize wind development projects on BLM lands in New Mexico.

However, based on our experience with BLM planning and regulatory efforts for oil and gas leasing and development, we are concerned that New Mexico BLM offices will not be provided with sufficient planning, permitting and enforcement staff to ensure that the proper mitigation strategies and methods identified by the PEIS are in fact implemented and enforced on the ground. In our opinion, current staffing levels do not provide adequate personnel to ensure enforcement of wildlife and wildlife habitat protection, mitigation and reclamation measures for oil and gas development on BLM land in New Mexico. Therefore, we recommend that the Final

80045-1

PEIS address how this issue will be dealt with in all of the individual western states that are covered under this PEIS.

80045-1
(cont.)

We appreciate the opportunity to comment on this PEIS. We look forward to working with New Mexico BLM staff to ensure that these wildlife and wildlife habitat protection and mitigation measures, BMPs, stipulations and standards and guidelines reviewed by the PEIS are considered and implemented where necessary for future wind development projects on BLM lands in New Mexico. Should you have any questions regarding our comments, please contact Mark Watson, Habitat Specialist, of my staff at (505) 476-8115, or <mwatson@state.nm.us>.

Sincerely,



Lisa Kirkpatrick, Chief
Conservation Services Division

LK/MLW

Atch. (1)

CC: Joy Nicholopoulos (Ecological Services Field Supervisor, USFWS)
Bruce Thompson (Director, NMGF)
Tod Stevenson (Deputy Director, NMGF)
Luke Shelby (Assistant Director, NMGF)
Area Chiefs (NMGF)
Area Habitat Specialists (NMGF)
Sandy Williams (Conservation Services Ornithologist, NMGF)
Conservation Services Mammalogist (NMGF)
Mark Watson (Conservation Services Habitat Specialist, NMGF)

GOVERNOR
Bill Richardson



DIRECTOR AND SECRETARY
TO THE COMMISSION
Bruce C. Thompson

STATE OF NEW MEXICO
DEPARTMENT OF GAME & FISH

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David Henderson
Santa Fe, NM

Jennifer Atchley Montoya
Las Cruces, NM

Peter Pino
Zia Pueblo, NM

Guy Riordan
Albuquerque, NM

Leo Sims
Hobbs, NM

December 16, 2003

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

Re: NOI to Prepare a Programmatic Environmental Impact Statement
To Evaluate Wind Energy Development on Western BLM Lands
NMGF Doc. No. 8976

Dear Sirs:

The New Mexico Department of Game and Fish has reviewed the 17 October 2003 Federal Register document regarding the above-referenced project. According to the document, the Bureau of Land Management (BLM) will prepare a Programmatic Environmental Impact Statement (PEIS) to evaluate issues associated with wind energy development on western public lands (excluding Alaska) administered by the BLM. The BLM requests information and comments on resources in the western United States that wind energy development may impact.

Commercial-sized wind energy turbine projects are known to have adverse impacts on birds and bats by direct killing. We provide the following recommendations for analysis in the PEIS and recommend that the BLM adopt these recommendations as policy and standard operating procedure for project proponents for design, siting, construction and post-construction monitoring efforts for wind energy development projects relative to impacts on wildlife and habitats. Most of these guidelines are taken from the 10 July 2003 (Volume 68, Number 132) Federal Register, U.S. Fish and Wildlife Service's Interim Voluntary Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines. For additional information on impacts to birds and bats, we refer you to this publication.

Sighting and Configuration

Avoid placing turbines in documented locations of any species of wildlife, fish or plant protected under the Federal Endangered Species Act. Consult and coordinate with the state wildlife agency regarding any potential impacts of site development to state threatened, endangered or sensitive species. Consider site development impacts on BLM sensitive species.

Avoid locating turbines in high concentration areas or important habitats for birds such as 1) known seasonal bird migration pathways (for neotropical and regional migrants, including

songbirds, waterfowl, raptors, shorebirds; 2) known daily movement flyways (e.g., between roosting and feeding areas); 3) areas near water, i.e. springs, rivers, lakes, riparian areas, seasonal and permanent playas, sloughs, prairie potholes and other wetlands; 4) occupied or potential habitat for lekking gallinaceous bird species such as lesser prairie chickens and sage grouse, which are known to exhibit extreme avoidance of vertical features and/or structural habitat fragmentation; and 5) areas with a high incidence of fog, mist, low cloud ceilings, and low visibility, due to the incidence of large night-migrating bird kills due to tower lighting.

Configure turbine locations to avoid areas or features of the landscape known to attract raptors (hawks, falcons, eagles, owls). For example, golden eagles, hawks, and falcons use cliff/rim edges extensively; setbacks from these edges may reduce mortality. Other examples include not locating turbines in saddles, dips or passes in a ridge. Avoid locating turbines in or near prairie dog colonies or attracting high densities of prey animals (rodents, rabbits, etc.) used by raptors.

Configure turbine arrays to avoid potential avian mortality where feasible. For example, group turbines rather than spreading them widely, and orient rows of turbines parallel to known bird movements, thereby decreasing the potential for bird strikes. Implement appropriate storm water management practices that do not create water attractions for birds and bats.

Avoid placing turbines near known bat hibernation, breeding and maternity/nursery colonies, in bat migration corridors, or in flight paths between colonies and feeding areas.

Avoid fragmenting large, contiguous tracts of wildlife habitat. Where practical, place turbines on lands already altered or cultivated, and away from areas of intact and healthy native habitats. If not practical, select fragmented or degraded habitats over relatively intact areas.

Reduce availability of carrion by practicing responsible animal husbandry (removing carcasses, fencing out cattle, etc.) to avoid attracting Golden Eagles and other raptors.

Post-development mortality studies should be a part of any site development plan to determine if or to what extent bird and bat mortality occurs. Studies should be designed in coordination with Federal and state agency biologists.

Turbine Design and Operation Recommendations

Use tubular supports with pointed tops rather than lattice supports to minimize bird perching and nesting opportunities. Avoid placing external ladders and platforms on tubular towers to minimize perching and nesting. Avoid use of guy wires for turbine or meteorological tower supports. All existing guy wires should be marked with recommended bird deterrent devices (*Avian Power Line Interaction Committee (APLIC). 1996. Suggested Practices for Raptor Protection on Power Lines. Edison Electric Institute/Raptor Research Foundation, Washington D.C., 128 pp.* and *Mitigating Bird Collisions with Power Lines: The State of the Art in 1994. Edison Electric Institute, Washington, D.C. 78 pp.* Copies can be obtained via the Internet at <http://www.eei.org/resources/pubcat/enviro/>, or by calling 1-800-334-5453).

If taller turbines (top of the rotor-swept area is >199 feet above ground level) require lights for aviation safety, the minimum amount of pilot warning and obstruction avoidance lighting specified by the Federal Aviation Administration (FAA) should be used (*Federal Aviation*

Administration. 2000. Obstruction marking and lighting. Advisory Circular AC 70/7460-1K, Air Traffic Airspace Management. 31 pp.). Unless otherwise requested by the FAA, only white strobe lights should be used at night, and these should be the minimum number, minimum intensity, and minimum number of flashes per minute (longest duration between flashes) allowable by the FAA. Solid or pulsating red incandescent lights should not be used, as they appear to attract night-migrating birds at a much higher rate than white strobe lights.

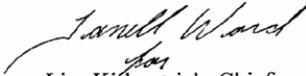
Where feasible, place electric power lines underground (see NMGF Trenching Guidelines) or on the surface as insulated, shielded wire to avoid electrocution of birds. Use recommendations of the Avian Power Lines Interaction Committee (1994, 1996) for any required above-ground lines, transformer, or conductors.

High seasonal concentrations of birds may cause problems in some areas. If, however, power generation is critical in these areas, an average of three years monitoring data (e.g., acoustic, radar, infrared, or observational) should be collected and used to determine peak use dates for specific sites. Where feasible, turbines should be shut down during periods when birds are highly concentrated at those sites.

When upgrading or retrofitting turbines, follow the above guidelines as closely as possible. If studies indicate high mortality at specific older turbines, retrofitting or relocating is highly recommended.

We appreciate the opportunity to comment on this project. Should you have any questions regarding our comments, please contact Mark Watson, Habitat Specialist, of my staff at (505) 476-8115, or <mwatson@state.nm.us>.

Sincerely,



Lisa Kirkpatrick, Chief
Conservation Services Division

LK/MLW

Attch.

CC: Joy Nicholopoulos (Ecological Services Field Supervisor, USFWS)
Area Habitat Specialists (NMGF)
Sandy Williams (Conservation Services Ornithologist, NMGF)
Terrence Enk (Conservation Services Mammalogist, NMGF)
Mark Watson (Conservation Services Habitat Specialist, NMGF)

Response for Document 80045

80045-001: The BLM is committed to full implementation of the Wind Energy Development Program proposed policies and BMPs (Section 2.2.3.1, Proposed Policies, and Section 2.2.3.2, Proposed BMPs) and will work within its budget and available resources to accomplish this.

Document 80046

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Monday, December 06, 2004 5:13 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80046

Thank you for your comment, Robert Thayer.

The comment tracking number that has been assigned to your comment is 80046. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 6, 2004 05:12:45PM CDT

Wind Energy EIS Draft Comment: 80046

First Name: Robert
 Middle Initial: L
 Last Name: Thayer
 Organization: Bioregional planning consultant
 Address: 2329 Goldberry Lane
 City: Davis
 State: CA
 Zip: 95616
 Country: USA
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I have conducted research in wind energy siting conflicts since 1985. The three most critical issues in wind farm siting are: 1) avian mortality, 2) visual intrusion/compatibility, and 3) need for local regions accepting wind farms to be given "localized benefits" from the siting and installation of specific wind energy projects.

Therefore: 1) Any comprehensive federal program to establish wind energy developments should be preceded by equally comprehensive baseline avian migration and foraging studies; 2) any comprehensive federal program to establish wind energy developments should be preceded by baseline visibility studies, particularly from population centers and existing or proposed wilderness areas, and; 3) all federally-sanctioned wind energy developments should be accompanied by a stipulation that such energy developers designate a fixed percentage of kWh fee to a fund whose proceeds will go to local non-profit organizations in the region affected by the wind farm development.

| 80046-1

| 80046-2

| 80046-3

Robert Thayer
 Davis, CA
 December 6, 2004

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 80046

- 80046-001:** As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, which could include the evaluation of avian migration and foraging patterns, 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. Comprehensive baseline studies of avian migration and foraging are beyond the scope of the PEIS.
- 80046-002:** As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including the evaluation of visibility issues, 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. Comprehensive visibility studies are beyond the scope of the PEIS.
- 80046-003:** Portions of the federal revenues associated with wind energy development on BLM-administered lands are distributed to local governments under both (1) the Payments in Lieu of Taxes (PILT) program appropriated by Congress, and (2) provisions of the Reclamation Act of 1902 that distribute a percentage of the federal receipts. The BLM has no authority over the distribution of these funds at the local level.

Document 80047

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Tuesday, December 07, 2004 1:49 AM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80047

Thank you for your comment, Clint Carroll.

The comment tracking number that has been assigned to your comment is 80047. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 7, 2004 01:49:24AM CDT

Wind Energy EIS Draft Comment: 80047

First Name: Clint
 Last Name: Carroll
 Address: 2100 Channing Way
 Address 2: #258
 City: Berkeley
 State: CA
 Zip: 94704
 Country: USA
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I strongly oppose the establishment of over-arching protocol for wind energy development projects on the basis that the environmental and socio-cultural risks are too high. I urge the committee to consider each project on its own terms, as each project demands close attention to the specific risks at hand.

I do not support the proposed action because it is presented as a speedy way for energy companies to develop on public land. We should not place private interests above the careful consideration of the environmental and social impacts of each wind energy project.

The report lists a large amount of adverse impacts of such projects and I have also heard personal accounts of what these projects do. These accounts have not been positive. If we wish to develop alternative methods for energy production, then these methods should account for and be respectful to the health of humans and the associated ecosystem. I believe this issue can be addressed with careful planning, not shortcuts.

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

80047-1

Response for Document 80047

80047-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80048

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Tuesday, December 07, 2004 11:14 AM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80048

Thank you for your comment, Charles Supsic.

The comment tracking number that has been assigned to your comment is 80048. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 7, 2004 11:13:47AM CDT

Wind Energy EIS Draft Comment: 80048

First Name: Charles
Last Name: Supsic
Address: 300 N.Ninth St.
City: Wheeling
State: IL
Zip: 60090
Country: USA
Email: retooler2000@yahoo.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I believe it's time to invest our tax dollars into alternative energy sources.

| 80048-1

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 80048

80048-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80049**WindEISArchives**

From: windeiswebmaster@anl.gov
Sent: Tuesday, December 07, 2004 11:54 AM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80049



BLM-EIS-comments
_80049.doc (27...

Thank you for your comment, Rebecca Efroymson.

The comment tracking number that has been assigned to your comment is 80049. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 7, 2004 11:54:11AM CDT

Wind Energy EIS Draft Comment: 80049

First Name: Rebecca
Middle Initial: A
Last Name: Efroymson
Organization: Oak Ridge National Laboratory
Address: PO Box 2008
Address 2: MS 6036
City: Oak Ridge
State: TN
Zip: 37831
Country: USA
Email: efroymsonra@ornl.gov
Privacy Preference: Don't withhold name or address from public record
Attachment: D:\proposals\wind energy\BLM-EIS-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.

Comments from Dr. Rebecca Efroymsen, Oak Ridge National Laboratory, Oak Ridge, TN,
efroymsenra@ornl.gov, 865-574-7397.
 December 7, 2004

Please note that these comments do not reflect the opinion or policy of officials at Oak Ridge National Laboratory or the US Department of Energy.

<p>General comment: I agree that the proposed action appears to provide the best approach for managing wind energy development on BLM-administered lands. The EIS is generally well written and comprehensive. (My expertise is in the field of ecological risk assessment.) I have several comments that could improve the document.</p>	80049-1
<p>p. 5-36. Below these bullets or elsewhere, it would be helpful to mention that spatially-explicit, individual-based models are good tools for estimating abundance and “self-sustaining levels” of populations.</p>	80049-2
<p>p. 5-39, para 2. It would be helpful to have a paragraph on differences in recovery times for different types of ecosystems. For example, while recovery from physical disturbance in wet ecoregions may take years or a few decades, recovery in arid systems can take centuries.</p>	80049-3
<p>p. 5-45, para 2. Please clarify 1st sentence. Does this mean that no reproductive or behavioral effects (avoidance, flying from nest) have been observed?</p>	80049-4
<p>p. 5-49, para 2. Direct impacts are usually considered to be those that impact animals directly, such as collision or toxicity. Effects on species-specific habitat are generally considered indirect or secondary effects (these are direct effects on plants and soil).</p>	80049-5
<p>p. 5-49, para 2. More attention should be given to potential population-level effects, such as extinction risk. As mentioned above, the document would benefit from a discussion of individual-based models and their potential role in estimating population abundance and sustainability, based on quantity of habitat removed, extent of fragmentation (and actual spatial configuration of turbines, roads, power lines, etc.), and species life history characteristics.</p>	80049-6
<p>p. 5-49, para 4. The document would benefit from a discussion of tools that are available (or under development) to assess risk of collision. For example, Richard Podolsky gave a presentation at the latest National Wind Coordinating Committee wildlife meeting on such a model [http://www.nationalwind.org/events/wildlife/200411/presentations/Podolsky_Risk.pdf] Also, individual-based models would be useful for translating mortality figures to population-level effects.</p>	80049-7
<p>p. 5-57. last para. It is asserted that the avian fatality rates in 5.9.3-3 should be considered overestimates. However, Morrison (2002) asserts that searcher efficiency can range from 35-85%. Please indicate whether or not searcher efficiency was incorporated into the estimates in Table 5.9.3-3. (Morrison, M. 2002. Searcher bias and scavenging rates in bird/wind energy studies. NREL/SR-500-30876. National Renewable Energy Laboratory, Golden, CO.)</p>	80049-8
<p>p. 5-58, Table 5.9.3-3. Last column. Is this per year?</p>	80049-9
<p>p. 5-65, 1st bullet. A reference for the statement that road cuts are favored by pocket gophers and ground squirrels would be helpful.</p>	80049-10

p. 5-67, Table 5.9.3-6. Last column. Is this per year?

| 80049-11

p. 5-73. Bullets 2 and 6. It is important to note that the patch size and location of compensatory habitat restoration should be carefully considered. One hectare of sagebrush habitat does not have equivalent value in all locations.

| 80049-12

Responses for Document 80049

- 80049-001:** Thank you for your comment. We appreciate your input and participation in the public review process.
- 80049-002:** Specific models, tools, or approaches for species- and site-specific studies and monitoring programs will be selected at the project level in conjunction with input from other federal, state, and local agencies, and interested stakeholders. A discussion of the appropriateness of individual-based models for estimating animal abundance and population status is beyond the scope of the PEIS. No text change has been made to the document in response to your comment.
- 80049-003:** The PEIS acknowledges and adequately points out that recovery times will differ among habitats, and that some may never fully recover. The potential for disturbed habitats to recover, as well as the methods to be used for habitat restoration (recovery) will be considered during the Plan of Development. As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses will be conducted for any wind energy project proposed for BLM-administered lands. These site-specific analyses will include the identification of habitats at the proposed project area that may be affected by the project. The BMPs also require that a habitat restoration plan be developed for each proposed facility. The scope and approach for the analyses and restoration 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 and restoration stipulations for incorporation into the POD. No text change has been made to the document in response to your comment.
- 80049-004:** The 1st sentence of this paragraph has been revised to indicate that blast noise has been found to elicit a variety of effects on wildlife. The remaining text provides examples of those effects.
- 80049-005:** The text has been revised per the comment.
- 80049-006:** The potential for population-level effects is acknowledged throughout Section 5.9, and many of the policies and BMPs developed for the Wind Energy Development Program are intended to aid in siting, designing, and operating wind energy facilities so that the potential for population-level effects is avoided, minimized, or mitigated. A discussion of individual-based models (IBMs) is beyond the scope of the PEIS. The use of IBMs or any other models, tools, or approaches for evaluating potential wind energy impacts on ecological resources will be determined on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. No text change has been made to the document in response to your comment.

- 80049-007:** The methods and approaches for monitoring avian collisions and evaluating impacts (such as population-level effects) from collisions with wind energy facility structures will be selected on a project-by-project basis in conjunction with input from other federal, state, and local agencies, and interested stakeholders. No text change has been made to the document in response to your comment.
- 80049-008:** Text has been added stating that the range of reported mortality rates probably reflects both differences in habitats among the various sites as well as differences in the design of the survey methods used at the various facilities. The new text also points out that the methods used are not equivalent between facilities, and that because of likely differences in searcher efficiency and survey design, may not accurately estimate mortality rates.
- 80049-009:** The table has been changed to indicate that the mortality rate is based on rotor swept area per year.
- 80049-010:** The reference for the last bullet on this page applies to all the bullets in this list. In addition, earlier text in the text box discusses the use of road cuts by pocket gophers and ground squirrels and cites a reference. No text change has been made to the document in response to your comment.
- 80049-011:** The table has been revised to indicate that the raptor fatalities per RSA are on a "per year" basis.
- 80049-012:** As required by the Wind Energy Development Program proposed policies and BMPs, site-specific restoration plans will be required for any wind energy project proposed for BLM-administered lands. The scope and approach of the restoration 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 habitat restoration 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 the local, site-specific restoration plans. The stipulation of site-specific restoration plan requirements is beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

Document 80050***WindEISArchives**

From: windeiswebmaster@anl.gov
Sent: Tuesday, December 07, 2004 1:09 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80050



BLMcomments_800
 50.wpd (34 KB)

Thank you for your comment, Gerald Winegrad.

The comment tracking number that has been assigned to your comment is 80050. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 7, 2004 01:09:20PM CDT

Wind Energy EIS Draft Comment: 80050

First Name: Gerald
 Middle Initial: W
 Last Name: Winegrad
 Organization: American Bird Conservancy
 Address: 1834 Jefferson Place, NW
 City: Washington, DC
 State: DC
 Zip: 20036
 Country: USA
 Privacy Preference: Don't withhold name or address from public record
 Attachment: C:\My Documents\WIND TURBINES\BLMcomments.wpd

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.



AMERICAN BIRD CONSERVANCY

CONSERVING WILD BIRDS AND THEIR HABITATS THROUGHOUT THE AMERICAS

December 7, 2004

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

Dear BLM:

These comments are submitted on behalf of American Bird Conservancy on the Bureau of Land Management (BLM) Draft Programmatic Environmental Impact Statement (DPEIS) on Wind Energy Development on BLM-Administered Lands in the Western United States. ABC is a 501(c)(3) not-for profit organization whose sole mission is to conserve wild birds and their habitats throughout the Americas. ABC has offices in The Plains, Virginia, and Washington, D.C., and staff in Colorado, Oregon, Missouri, Montana, and Vermont. ABC has more than 300 partner organizations in the Americas primarily through its leadership roles in the North American Bird Conservation Initiative, Partners in Flight, ABC's 88 member organization Bird Conservation Alliance, and ABC's international network.

American Bird Conservancy has been actively engaged in wind energy and avian impacts for some time. ABC fully supports the development of wind energy in the U.S. as an alternative to fossil fueled power plants to meet the current and growing demand for electrical energy. However, we emphasize that wind energy projects should be operated and designed to prevent/minimize bird mortality. We are concerned that the DPEIS does not adequately address avian impacts and we would recommend that BLM review ABC's Wind Energy Policy and consider its recommendations for inclusion before adopting the final EIS. You may access this Policy at: <http://www.abcbirds.org/policy/windenergy.htm>.

Along with the American Wind Energy Association, ABC co-sponsored a two day Wind Energy and Birds Workshop and the proceedings have now been posted at: www.abcbirds.org/policy/webb_proceedings.pdf. There are excellent summaries of presentations with a good deal of current information on wind energy and birds found in these proceedings.

ABC recognizes the need to shift toward clean, renewable power sources like wind energy, but is concerned about the potential threat to birds from the construction and operation of wind energy projects. Wind energy production may affect birds through:

- 1) Mortality from collisions with the turbine blades, towers, power lines, or with other related structures, and electrocution on power lines;
- 2) Avoidance of the wind turbines and habitat surrounding them; and
- 3) Direct habitat impacts from the turbines' footprint, roads, power lines, and auxiliary buildings.



1834 JEFFERSON PLACE, NW • WASHINGTON, DC • 20036
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80050-1



It does not appear that the DPEIS adequately addresses these concerns. A more thorough review of recent data and literature on avian impacts from wind turbines should be conducted. ABC believes that with sound pre-construction analysis of each wind energy site and proper safeguards to protect birds from the three distinct threats outlined above, wind energy can be an environmentally sound choice for our nation's energy future. It is in this spirit that we recommend that the BLM adopt the proposed action in the DPEIS which would implement a Wind Energy Development Program, establish Best Management Practices for wind energy authorizations, and amend a number of BLM land use plans only if it adopts and addresses the following seven recommendations to reduce the risk of harm to avian species. Otherwise, we recommend that alternative #3 be adopted, a limited wind energy development alternative, which would allow wind energy development only in limited, selected locations.

80050-1
(cont.)

80050-2

Here are our recommendations which should become BLM Best Management Practices to prevent avian impacts and safeguard other wildlife:

(1) BLM ADOPT THE U.S. FWS GUIDELINES.

Very careful consideration must be given to each site for wind turbine projects. BLM should adopt uniform guidelines or regulations to assure the prevention or minimization of avian impacts from new wind turbine construction and operation. Comprehensive voluntary guidelines for siting, operating, and preventing/minimizing avian and other wildlife impacts have been issued by the U.S. Fish and Wildlife Service. See Interim Voluntary Guidelines To Avoid and Minimize Wildlife Impacts from Wind Turbines, dated July 2003, and accessible at: <http://www.fws.gov/r9dhcbfa/wind.pdf>. BLM should adopt these guidelines, even if modified, or similar guidelines for all wind energy facilities on BLM lands. Examples of other guidelines that are useful include the comprehensive Washington State Department of Fish and Wildlife Guidelines for Wind Energy Projects dated August 2003 at: <http://wdfw.wa.gov/hab/engineer/windpower/index.htm>.

80050-3

Such guidelines provide important steps for proper siting, operation, and monitoring of wind projects. The final EIS should contain comprehensive guidelines and we suggest that BLM use your sister agency's guidelines, especially since FWS is statutorily vested with responsibility for birds under the MBTA, ESA, and Golden and Bald Eagle Protection Acts.

(2) BLM REQUIRE SITING REVIEW.

As recommended by the guidelines and ABC Policy referenced above, surveys should be conducted before wind turbines are approved or constructed that would entail both on-site observations of birds on a seasonal basis (e.g., bird passage during spring and fall migration), as well as more detailed evaluation of the use of the site by birds, particularly of species of concern. Surveys for nocturnal migrants where migratory corridors exist, especially for wind projects along mountain ridgelines, should be conducted. If there are science-based concerns over avian mortality requiring more detailed surveys, two years of pre-construction surveys of migratory birds should be considered.

80050-4

As migration is highly variable in magnitude and temporal and spatial distribution, one year is considered a minimum for identifying potential problems, unless projects are very small or located in areas that have a very low risk to birds. The intensity and duration of preliminary studies can be reduced for projects in areas where risk to birds is clearly low, such as with small projects or projects in areas where existing data suggest little bird risk. Other research techniques and tools, such as Nexrad, may evolve that can provide an adequate level of confidence about migratory patterns and behavior and may be able to reduce the time required for such studies.

There are two basic steps that should be followed when reviewing sites for bird abundance and migration patterns:

First, biologists should complete a site assessment by conducting a literature review, evaluating existing published and unpublished data, speaking with people knowledgeable about the area, and conducting reconnaissance surveys to document major vegetation types and likelihood of bird, bat and other wildlife impacts. These reconnaissance surveys should be used to identify potential issues related to site development and to eliminate sites that have a likelihood of causing significant negative wildlife impacts following development. Before wind turbines are approved or constructed, surveys should be conducted by a team with no vested interests in the site selected, including federal and/or state agency wildlife professionals. These surveys should include both on-site observations of birds on a seasonal basis and more detailed evaluation of the use of the site by birds, particularly of species of concern, such as nocturnal migrants. After eliminating sites with a likelihood of significant harm to wildlife, more intense studies should be initiated to quantify bird use of the site.

Second, after potentially suitable sites are located, a second level of more intensive surveys should be initiated, if warranted, that quantify bird and bat use of the proposed sites. These follow-up surveys may be necessary because reconnaissance surveys may not provide the level of understanding and detail needed for siting a wind farm, or for siting individual turbines. In other situations, such as for Golden Eagles at Altamont Pass in California, even more intensive studies are indicated (i.e., population level studies).

Sites known to be used by birds listed under the Endangered Species Act that may impact these species should be avoided. Wind turbines should not be sited in known major bird migration pathways, in areas where birds are highly concentrated, or in areas or landscape features known to attract large numbers of raptors. BLM should delineate areas that cannot be used for wind energy production because of potential impacts to birds, bats, and other wildlife, as well as designated critical habitat lands, wilderness areas or wilderness study areas.

Please see our Wind Energy policy and the FWS and the Washington State Department of Fish and Wildlife Guidelines cited above for details on siting surveys.

(3) BLM REQUIRE MINIMAL LIGHTING ON STRUCTURES. Limiting lighting on all turbines, towers, and auxiliary buildings is a high priority to prevent avian mortality. Although FAA Guidelines require that any structure over 200' must be lit for aviation safety, only a few

80050-4
(cont.)

80050-5

wind turbines in a project should be and need be individually lit. For example, only 12 of the 44 turbines at the Mountaineer, WV site are lit and all of the lit towers employ red strobes, pulsing at 24 times per minute. Any lighting should be with strobe lights, either white or red. The pulse rate should be kept to 20 pulses per minute, if possible, and the pulses should be synchronized on all turbines so all flash at once. Any related structures should not be lit unless required by the FAA, and these lights should be shielded and kept to a minimal intensity.

The largest single avian mortality event ever recorded at a wind turbine site (27 birds found) is believed to have been caused or at least aggravated by a bright, sodium vapor lighting system on an auxiliary building, a substation. This was at the Mountaineer Wind Energy Project in West Virginia, where the building lights were eventually turned off after the mortality event and no such event has occurred there again.

The best science available indicates that particularly in poor visibility weather conditions at night, lights on towers and other obstructions (especially red solid state or slowly blinking lights) confuse a neotropical migratory bird's celestial navigation system and perhaps its magnetic navigation system. This resulting disorientation causes the birds to fly to the light source and circle the light source at the tower, causing the bird to be unable to establish its directional cues, and greatly increase its probability of striking the tower and guy wires, flying into other birds also circling, or losing most navigational capability and flying into the ground or ancillary structures.

The U.S. FWS Tower Siting Guidelines provide that "The use of solid red or pulsating red warning lights at night should be avoided. Current research indicates that solid or pulsating (beacon) red lights attract night-migrating birds at a much higher rate than white strobe lights." See: <http://migratorybirds.fws.gov/issues/towers/comtow.html>. Documentation of this is found in several scientific documents, which we can provide upon request.

Most importantly, on April 6, 2004 the FAA issued a Memo regarding obstruction lighting to all Regional Air Traffic Division Managers. It states "Therefore, in consideration of the agreement between the FAA and the American Bird Conservancy, please advise your staff that medium intensity white strobe lights for nighttime conspicuity is to be considered the preferred system over red obstruction lighting systems to the maximum extent possible without compromising safety." The FAA cites the above mentioned FWS Tower Guidelines. See the attached FAA Memo.

The BLM EIS should clearly detail these lighting preferences—white or red synchronized medium intensity strobes but only on a few turbines and no lights on other structures unless absolutely required for safety.

(4) BLM PROHIBIT THE USE OF GUY WIRES AND LATTICE SUPPORTS. Guy wires should not be used for turbines, permanent meteorological towers, or communication towers. Tubular supports with pointed or sloped tops should be used rather than lattice supports to minimize bird perching and nesting. Where met towers use lattice supports, they should be

80050-5
(cont.)

80050-6

diagonal. Nearly all utility-scale wind turbines are monopoles, without guy wires. Guy wires are known bird killers and should be avoided. Recent U.S. studies indicate that bird mortality at wind turbine projects varies from less than one bird/turbine/year to as high as 7.5 birds/per turbine/year. The latter fatality rate was at Buffalo Mountain, TN, where three wind turbines are in use, each with a 154' diameter, 3-blade rotor mounted on a 213' tall tubular steel tower. A meteorological tower constructed for the Buffalo Mountain wind plant had a mortality rate of 8.1 birds/year. It was guyed and lit.

80050-6
(cont.)

(5) BLM REQUIRE THAT WIND TURBINE POWER LINES BE UNDERGROUND AND THAT POWER LINES SHOULD, AT A MINIMUM, COMPLY WITH APLIC STANDARDS TO PREVENT AVIAN ELECTROCUTIONS AND COLLISIONS. Power lines should be placed underground to prevent avian collisions and electrocutions. All above-ground lines, transformers, or conductors should fully comply with the Avian Power Line Interaction Committee (APLIC) published standards to prevent avian mortality. See: <http://www.aplic.org/resources.htm> for publications offering a comprehensive portrait of the progress in documenting and addressing the issue of bird collisions and electrocutions at power lines, with a focus on both study techniques and management options for mitigating bird mortality situations. These publications emphasizes the need for attention to this issue before, during, and after line construction.

80050-7

(6) BLM SHOULD REQUIRE HABITAT REVIEW AND MITIGATION. Habitat fragmentation, avian disturbance, and avian site avoidance from the construction and operation of wind turbines, roads, transmission facilities, and other related facilities should be minimized and avoided where possible. The DPEIS discussion of this issue needs to be expanded and guidelines adopted that would fully address this issue. Wind project developers should be encouraged to: (1) site wind power projects on disturbed lands; (2) place linear facilities in or adjacent to existing disturbed corridors in order to minimize habitat fragmentation and degradation; and (3) avoid using or degrading high value habitat areas.

Of particular concern in western states are grassland breeding species. Prairie grouse are of great concern in wind energy development.

80050-8

The final EIS should also address and discourage the location of wind turbine projects in Important Bird Areas, wilderness areas, wilderness study areas, critical habitat of endangered birds and bats, in designated Areas of Critical Environmental Concern, and on other sensitive lands. BLM should delineate such areas that cannot be used for wind energy production because of their environmental sensitivity.

Habitat mitigation should be considered for wind energy projects developed on undisturbed habitat or, where appropriate, to mitigate direct mortality to birds and bats. See the Washington State Guidelines for an example of mitigation measures that could be applied.

(7) BLM SHOULD REQUIRE SAMPLING FOR AVIAN MORTALITY. Statistically robust studies of avian and bat mortality should be required for at least two years after operation of the turbines begins. If the monitoring raises mortality concerns, the studies should continue until these concerns are resolved. Permits should specify the degree of precision required in these studies. Monitoring data should be available to the public. Significant bird mortality from the operation of any turbine should be promptly rectified. This may necessitate shutting down turbines during periods of peak risk to birds or bats. Please see the ABC Wind Energy Policy and the U.S. FWS Wind Energy Guidelines.

80050-9

Thank you for the opportunity to comment on measures to better protect birds and other wildlife from wind energy development on BLM administered lands. The above seven measures should be included as Best Management Practices in the final BLM wind energy policy.

80050-2
(cont.)

We would be happy to provide citations to the data we outline above or provide more data on these issues.

Respectfully Submitted,



Gerald W. Winegrad
Vice President for Policy

cc: Lee Otteni, Bureau of Land Management, Farmington Field Office, 1235 La Plata Highway, Suite A, Farmington, NM 87401

U S Department
of Transportation
Federal Aviation
Administration

Memorandum

ACTION: Advisory Circular (AC) 70/7460-1

Date: Apr. 6, 2004

From:
Program Director for Air Traffic
Airspace Management, ATA-1

To:
Regional Air Traffic Division Managers

The American Bird Conservancy has requested that the Federal Aviation Administration (FAA) standardize existing requirements for lighting systems on tall structures to minimize mortality to migratory birds. Specifically, the American Bird Conservancy, based on guidelines developed by the U.S. Fish and Wildlife Service, requests that the FAA reduce the issuance of aeronautical determinations recommending red lights at night and that white strobe lights be recommended for nighttime conspicuity.

The Federal Communications Commission has issued a Notice of Inquiry regarding the effects that may provide some guidance on and further study. At this time, there are no plans to change the existing standards in Advisory Circular (AC) 70/7460-1, Obstruction Marking and Lighting. From a safety perspective, we believe that the current standards and guidance are necessary to appropriately light obstacles and to avoid creating a hazardous condition for pilots. In the interim, we have agreed with the American Bird Conservancy, that when feasible and in cases in which safety would not be derogated, to consider and recommend the use of white lights for nighttime conspicuity instead of red lights.

It should be noted that in accordance with AC 70/7460-1, the use of which lights for nighttime conspicuity within three nautical miles of an airport or in populated urban areas is discouraged and should also be considered when making a marking and lighting recommendation.

Therefore, in consideration of the agreement between the FAA and the American Bird Conservancy, please advise your staff that medium intensity white strobe lights for nighttime conspicuity is to be considered the preferred system over red obstruction lighting systems to the maximum extent possible without compromising safety. Please refer to Chapter 6, Medium Intensity Flashing White Obstruction Light Systems, AC 70/7460-1K for specific guidance.

If you have any questions regarding this matter, please contact Reginald C. Matthews, Manager, Airspace and Rules Division ATA-400, at (202) 267-8783.

Sabra W Kaulia

Responses for Document 80050

- 80050-001:** Section 5.9.3.2.3 and its associated text boxes provide considerable discussion regarding the impacts of wind energy projects on birds, with detailed discussions provided for raptors and gallinaceous birds. The identification of specific siting and design stipulations, as well as mitigation measures for addressing potential avian impacts of wind energy development on BLM-administered lands will be conducted at the project level. As required by the Wind Energy Development Program proposed policies and BMPs, site-specific analyses, including the development of appropriate mitigation measures, will be conducted for any wind energy project proposed for 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 siting, design, and mitigation measure stipulations for incorporation into the POD. The presentation of site-specific siting, design, and mitigation details is beyond the scope of the PEIS. No text change has been made to the document in response to your comment.
- 80050-002:** Most of the recommendations suggested in this comment have already been incorporated into the proposed Wind Energy Development Program as discussed in the PEIS and the following responses.
- 80050-003:** The BLM and USFWS share a common objective in terms of minimizing potential impacts to wildlife from wind energy development activities. Many of the USFWS voluntary guidance recommendations are imbedded within the BLM's proposed policies and BMPs, reflecting consistent objectives and parallel approaches. However, because the USFWS guidance is interim and voluntary, it is inappropriate to adopt it wholly in the PEIS or the proposed Wind Energy Development Program. No text change has been made to the document in response to your comment.
- 80050-004:** These issues will be adequately addressed during the conduct of the site-specific analyses. Such analyses are required explicitly by the Wind Energy Development Program proposed BMP in the 5th bullet under Wildlife and Other Ecological Resources in Section 2.2.3.2.2, Plan of Development Preparation, that ensures an evaluation of avian and bat use of the proposed project area. The specific design of any monitoring program would be developed on a site-specific basis in coordination with the BLM and other appropriate resource agencies, and, as specified by the BMPs, would be scientifically rigorous and defensible.
- 80050-005:** Projects must comply with FAA lighting regulations as required by the proposed BMP in the 7th bullet under Human Health and Safety in Section 2.2.3.2.2, Plan of Development Preparation. In this same section, under

Visual Resources, the 3rd bullet requires that lighting on ancillary structures be minimized. Additional lighting configurations addressing avian collisions will be considered and evaluated, with FAA consultation and input from other federal, state, and local agencies, and interested stakeholders, on a project-by-project, site-specific basis.

80050-006: Thank you for your recommendation. The Wind Energy Development Program proposed BMP in the 1st bullet under Wildlife in Section 2.2.3.2.3, Construction, has been changed to indicate that guy wires on permanent meteorological towers shall be avoided. In addition, the wildlife BMPs presented in Section 2.2.3.2.2 call for site facilities, such as power poles, to be designed to minimize or prevent perching or nesting activities.

80050-007: The Wind Energy Development Program proposed BMP in Section 2.2.3.2.3, Construction, General, 6th bullet, requires collector lines to be buried adjacent roads unless burial would cause further habitat disturbance. The site-specific Plans of Development will incorporate this BMP and other relevant BLM mitigation guidance for power lines as required in Section 2.2.3.1, Proposed Policies, 13th bullet.

80050-008: As stated in the PEIS, Section 2.2.3.1, under the proposed Wind Energy Development Program the BLM will not issue ROW authorizations for wind energy development on lands on which wind energy development is incompatible with specific resource values. Lands that would be excluded from development include Wilderness Areas, National Monuments, NCAs, Wild and Scenic Rivers, National Historic and Scenic Trails, and Areas of Critical Environmental Concern.

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 will be conducted for any wind energy project proposed for BLM-administered lands. The scope and approach for site-specific analyses, which include ecological surveys, 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, mitigation, and monitoring stipulations for incorporation into the POD. 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.

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.

The identification of specific siting and design conditions is beyond the scope of the PEIS. No text change has been made to the document in response to your comment.

80050-009: The BLM is committed to full implementation of the Wind Energy Development Program proposed policies and BMPs that require the incorporation of monitoring programs and adaptive management strategies at all wind energy development sites (see Section 2.2.3.1, Proposed Policies, 17th bullet) in site-specific Plans of Development. During operation, observations of avian mortality shall also be reported immediately (see Section 2.2.3.2.4, Operation, Wildlife, 2nd bullet). Application of these strategies will ensure that BMPs will be revised as new data become available. Monitoring plans and adaptive management strategies to address the monitoring results will be developed on a project-specific basis.

Document 80051**WindEISArchives**

From: windeiswebmaster@anl.gov
Sent: Tuesday, December 07, 2004 8:26 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80051

Thank you for your comment, Charles Battaglia.

The comment tracking number that has been assigned to your comment is 80051. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 7, 2004 08:25:56PM CDT

Wind Energy EIS Draft Comment: 80051

First Name: Charles
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 Organization: University of California, Berkeley
 Address: 304 Hilgard Hall
 City: Berkeley
 State: CA
 Zip: 94720-5404
 Country: USA
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I feel any technology away from fossil fuels is worth pursuing, but wind needs to be looked at carefully. From what I've learned, each site needs to be looked at separately since there are different impacts in different areas. Avian wildlife is of special concern, so please consider individual EIR's for each proposed site

| 80051-1

| 80051-2

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 80051

- 80051-001:** 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.
- 80051-002:** As required by the Wind Energy Development Program proposed policies and BMPs, site-specific environmental assessments will be conducted for any wind energy project proposed for BLM-administered lands. The scope and approaches 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. Through this process, the BLM will develop and incorporate project-specific siting, design, construction, and operation stipulations for minimizing or mitigating impacts to ecological resources, including birds, into the POD. No text change has been made to the document in response to your comment.

Document 80052

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Tuesday, December 07, 2004 11:04 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80052

Thank you for your comment, Gale Dupree.

The comment tracking number that has been assigned to your comment is 80052. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 7, 2004 11:03:28PM CDT

Wind Energy EIS Draft Comment: 80052

First Name: Gale
 Middle Initial: G
 Last Name: Dupree
 Organization: Nevada Wildlife Federation (NvWF)
 Address: 216 East Hampton Drive
 City: Carson City
 State: NV
 Zip: 89706
 Country: USA
 Email: gale@nvwf.org
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

The NvWF is concerned that the Programmatic EIS does not adequately address sage grouse and sage grouse habitat. The BLM should ensure that wind energy infrastructure is not developed within two miles of known leks. New infrastructure should be located next to existing developed sites, such as, radio/telephone relay towers. Exploration and development of energy sites should be suspended during the sage grouse breeding and nesting season, in Nevada February through June. Wind energy towers should not be located on high ridge sites occupied by roosting sage grouse. Research should be conducted to determine what methods can be used to prevent sage grouse and other birds from flying into the turbines.

80052-1

Thank you for the opportunity to comment on Wind Energy.

Gale Dupree
 President
 Nevada Wildlife Federation

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 80052

80052-001: As required by the 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. 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. Research studies to determine methods for preventing bird-turbine collisions are beyond the scope of the PEIS.

Document 80053

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Wednesday, December 08, 2004 12:45 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80053

Thank you for your comment, Emily Van Engel.

The comment tracking number that has been assigned to your comment is 80053. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 8, 2004 12:45:03PM CDT

Wind Energy EIS Draft Comment: 80053

First Name: Emily
Last Name: Van Engel
Address: PO Box 6586
City: Jackson
State: WY
Zip: 83002
Country: USA
Email: evanengel@wesleyan.edu
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I support your proposed action to address issues associated with wind energy development and encourage future wind energy projects.

| 80053-1

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 80053

80053-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80054

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Wednesday, December 08, 2004 3:37 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80054

Thank you for your comment, Lesley Wischmann.

The comment tracking number that has been assigned to your comment is 80054. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 8, 2004 03:36:50PM CDT

Wind Energy EIS Draft Comment: 80054

First Name: Lesley
 Last Name: Wischmann
 Organization: Alliance for Historic Wyoming
 Address: 712 South Second Street
 City: Laramie
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 Zip: 82070
 Country: USA
 Email: lesleywisch@earthlink.net
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Thank you for this opportunity to comment on the Draft Programmatic Environmental Impact Statement.

The Alliance for Historic Wyoming is a nonprofit organization dedicated to protecting and advocating for the historic and cultural resources of the state of Wyoming.

We have several comments we would like to make in regards to the DPEIS. First of all, we support consistency in applying these standards between the various field offices of the BLM. However, we also want to stress that factors unique to each cultural or historic resource must receive adequate consideration.

One of the main challenges for AHW has been protecting the many miles of pristine historic emigrant trails that pass through Wyoming. While your document makes reference to protection of the National Historic Trails themselves, we fear that you have not paid enough attention to their unique setting, which provides a primary motivation for visiting these resources. Today, it is still possible to see some of these trails in Wyoming the same way the pioneers would have experienced them 150 years ago. We believe it is essential that this pristine setting remain this way. Viewsheds are absolutely critical to maintaining this historical integrity. How much land is protected on either side of the trail is important but no arbitrary limit is adequate to protect the experiential value of being on these trails and seeing them without modern intrusion. Wind energy generators have high potential for negatively impacting the setting. We are especially concerned about the trails in Wyoming's Sweetwater Valley which is shown as a high potential area.

80054-1

We are also concerned about the many historic trails that are not officially designated as NHTs, although they are eligible for the National Register and thus subject to Section 106 processes. The DPEIS should make specific mention of historic resources in this class and direct that Section 106 processes be applied on a case-by-case basis.

80054-2

Third, the Best Management Practices (BMPs) presented in the DPEIS for cultural resources are inferior to those being used to deal with many of the energy projects already being developed in Wyoming. For example, the BMPs in the Pinedale Anticline EIS provide much

80054-3

more detail on mitigation when an adverse impact is identified. We would encourage to establish more specific BMPs.

Thank you for considering our thoughts.

80054-3
(cont.)

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 80054

- 80054-001:** By including National Historic Trails within its NLCS, the BLM has recognized these trails as national treasures. The BLM accepts the responsibility to protect and preserve the value of these trails. This will be accomplished by protecting trail corridors associated with National Historic Trails, and segments of the trails, to the degree necessary to ensure that the values for which each trail was established remain intact. A BMP has been added to Section 2.2.3.2.2, Plan of Development Preparation, under the cultural/historic resources heading, specifying that when any ROW application includes remnants of a National Historic Trail, is located within the viewshed of a National Historic Trail's designated centerline, or includes or is within the viewshed of a trail eligible for listing on the *National Register of Historic Places*, the operator shall evaluate the potential visual impacts to the trail associated with the proposed project and identify appropriate mitigation measures for inclusion as stipulations in the POD.
- 80054-002:** The text states that the NHPA requires a project to take into consideration its effect on significant cultural resources. Significant resources are defined as those properties that are on the NRHP or those that are eligible for listing.
- 80054-003:** As stated in Section 2.2.3.2, additional guidance and BMPs are available from other BLM program-specific projects. As required by the Wind Energy Development Program proposed policies (Section 2.2.3.1), mitigation measures identified in or required by these existing guidance documents would be applied.

Document 80056

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Wednesday, December 08, 2004 5:28 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80056



comment_80056.doc
c (104 KB)

Thank you for your comment, Michael Perkins.

The comment tracking number that has been assigned to your comment is 80056. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 8, 2004 05:28:14PM CDT

Wind Energy EIS Draft Comment: 80056

First Name: Michael
Middle Initial: D
Last Name: Perkins
Organization: Worcester State College
Address: 14 Linda Street
City: Abington
State: MA
Zip: 02351
Country: USA
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Michael Perkins\My Documents\America\comment.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.

Michael Perkins

14 Linda Street
Abington, MA
02351
1-617-710-1417
mperkins@worchester.edu

January 10, 2005

Dear whom this may concern,

This is a comment letter about the numerous proposals to develop wind energy on BLM lands. The right-of-way grants are currently administered by the BLM and are required to stay within the guidelines of the Federal Land Policy and Management Act of 1976 and the BLM Wind Energy Development Policy. Through these right-of-way grants there is at least 500 MW of installed wind capacity. It is a good idea that other Federal agencies are now working together to expand the usage of wind energy.

I feel that it is good that you are allowing the public to submit comments on the scope of the Programmatic Environmental Impact Statement (PEIS). It is a way to generate ideas for future amendments to this document.

The current land-use plan amendments are adequate with the exception of the fact that none of them allow for competitive right-of-way bidding. They include the adoption of the proposed programmatic policies and best management practices (BMP's) and the identification of specified areas where wind energy development would not be allowed. Neither one of these amendments allows for competitive right-of-way bidding nor should this be changed to allow for a greater number of wind energy developments.

80056-1

The draft (PEIS) should be able to evaluate site-specific issues associated with wind energy development projects. There is already variation from site to site when it comes to location-specific factors such as soil type, habitat and numerous other factors. The goal for the BLM might be to update the draft (PEIS) to make these factors less variable.

80056-2

The draft (PEIS) has three alternatives that analyze the potential impacts associated with the development of wind energy. The proposed action alternative proposes that the BLM implements a comprehensive program to address the issues associated with the development of wind energy on BLM lands. This mainly focuses on site-specific and species specific concerns that would be addressed during project level reviews. This proposal is a good idea, because it would put a high priority in protecting certain sites and certain species that may be either endangered or threatened. According to the draft (PEIS) an impact analysis could be conducted in order to make amendments to this document. These elements along with proposed amendments of land use plans may result in less time and less money needed to complete future wind energy projects. I support this all the way, because wind power may become more affordable if the cost of development goes down. The consistency in the way right-of-way applications and grants are managed would ensure the development of wind energy. With the study of the impacts being incorporated into any future policy it would ensure the development of this resource in a nice orderly fashion. I also fell that knowing about the environmental impacts ahead of time would keep the negative environmental effects to a minimum. This idea may also ensure economic benefits to the eleven state area that the BLM controls, for example if the BLM were to adopt this policy it would mean added tax revenue during construction and during operation. I feel that this proposal is the best idea in this draft (PEIS).

80056-3

The no action alternative is a proposal that would allow the BLM to continue administering wind energy development right-of-way grants. Analysis and review of the development of wind energy would be considered on a project to project basis and any amendments made to individual land-use plans would occur without the analysis provided by the draft (PEIS). This is a bad idea, because without that document being used in the analysis the amendments would be prone to the influence of private interests. I feel that the impacts of the no action alternative would be both bad and good. For example the amendments made to land use plans would only occur on a plan-by-plan basis. There would also be a positive impact if this alternative were implemented, for example wind energy development would be subject to the terms of the Interim Wind Energy Development Policy. Without this policy wind energy development would occur at a slower pace and the amount of time it would take to approve right-of-way grants would increase.

The limited wind energy development alternative proposes that wind energy development would only occur in areas that have existing wind development projects; this alternative is bad, because if you want to promote wind development over a wider area why would you restrict it to

certain areas. This alternative should be changed so other areas are promoted for wind development. I feel that there is a problem with the Limited Wind Energy Development alternative. For example out of the three alternatives this one would be the least effective, because according to this statement that I am commenting on it would be the least effective due to the least number of environmental and economic benefits.

I feel that out of the three alternatives that the no action alternative is the best one. The current guidelines set up by the Wind Energy Development Policy ensure that the development of wind energy occurs in an orderly fashion. If I were you I would choose this alternative as your policy.

Sincerely,

Michael Perkins

Abington, Massachusetts

Sources

All of the facts I backed my opinions with were from the BLM Wind Energy Programmatic EIS.

80056-3
(cont.)

Responses for Document 80056

- 80056-001:** As discussed in Sections 1.2 and 2.2.4, none of the alternatives in the PEIS includes amendment of land use plans to provide for competitive right-of-way bidding, in part, because interest in this approach was limited to two areas in California (the Palm Spring-South Coast Field Office and the Ridgecrest Field Office). If competitive bidding is conducted, it will be addressed on a case-by-case basis in local BLM land use planning efforts.
- 80056-002:** The PEIS is a programmatic evaluation and does not evaluate site-specific issues (see Section 1.2, Scope of the Analysis). 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.
- 80056-003:** Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80057

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Wednesday, December 08, 2004 7:08 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80057



PEISopencomment
_80057.doc (39 ...

Thank you for your comment, Dustin Jolley.

The comment tracking number that has been assigned to your comment is 80057. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 8, 2004 07:07:25PM CDT

Wind Energy EIS Draft Comment: 80057

First Name: Dustin
Middle Initial: G
Last Name: Jolley
Address: po box 631
City: arcata
State: CA
Zip: 95518
Country: USA
Email: dgj2@humboldt.edu
Privacy Preference: Don't withhold name or address from public record
Attachment: F:\enr 410\PEISopencomment.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.

MEMORANDUM

TO: BLM WIND ENERGY PROGRAMMATIC EIS

FROM: DUSTIN JOLLEY; SENIOR UNDERGRADUATE, HSU
ENVIRONMENTAL RESOURCES ENGINEERING; AND STUDENT
ASISTANT RESEARCH ENGINEER, SCHATZ ENERGY RESEARCH
CENTER.

SUBJECT: DRAFT PEIS COMMENTS; WIND ENERGY DEVELOPMENT

DATE: 1/10/2005

Summary

In this DEIS, some of the areas and particular issues that would benefit from some improvement include:

- The DPEIS is inconsistent in Section 5, where the mitigations say “should” instead of “shall”. The mitigations should be required.
- Again, loose language is used where it is important to require mitigation measures be followed.
- The DPEIS is unclear as to what “credible” sources of data are.
- Very little background information is provided on the alternatives.
- Impact significance was not thoroughly defined.
- Criteria for when a project-specific DEIS is required should be included.

- Studies that could have been done to make design and/or policy improvements were not found.
- Criteria for when a project-specific EIS is required should be included in the PEIS.

COMMENTS:

Scoping and Intent

Identification of impacts is too general to be useful.

The preparers of the PEIS correctly outline the difficulty in addressing possible impacts on such a broad scale, however, this is such a large proposal, covering a number of widely differing ecosystems, that there is really no way to predict all of the impacts that may be caused to the environment in the process of developing wind energy in all of these locations. It is possible to outline some impacts that may occur in common on all of the project locations, but, their degree of severity will surely differ. The statement is made that current “credible” sources of data have been used to predict the significance and magnitude of many of the possible impacts. I was not able to find any definition of “credible sources” in the body of the PEIS. Most of the language referring to the possible impacts on certain resources or aspects of the environment comes with the statement that investigations will have to be made on the project level to appropriately evaluate the effects on that particular ecosystem. Toward the end of this quote, it is clear that no project specific impacts are addressed under this PEIS. This document is in other words, purely administrative, and while it appears that it is done in good faith, it does almost nothing to address any specific impacts caused by a proposed project.

80057-1

Purpose and Need

A summary of the stated purpose and need of this project would be the following: With recent administrative decisions to explore and develop other sources of energy, the BLM, with its millions of acres of land under stewardship, feels a responsibility to develop a policy

to tap into renewable energy that is available on public lands. The need is supported by the current energy crisis that many western states are facing.

The MPDS (maximum potential development scenario) is certainly favored in such a purpose and need statement; from the beginning, the MPDS is the preferred alternative.

Alternatives

The primary administrative goal (as stated in the MPDS scenario) appears to be the amendment of numerous land use plans in all 11 of the participating states. These amendments, in short, will be tailored to make pursuing energy development on public lands easier.

No evidence could be found on how the alternatives were formulated in the first place. Personally, I prefer the “no action alternative”, which is not really “no action”. The no action option says that the development project will simply continue on a project-to-project basis, which seems to make the most sense due to the huge variation in ecosystems where these projects will take place.

The wording makes me feel like the sole goal of this proposal is to allow the amendment of many land use plans to expedite the process of wind energy development. While I believe that renewable energies should be proactively developed and implemented, I feel it is important to go about it with as little negative impact to the environment as possible, otherwise the intention of using renewable energy will be negated. To ensure an overall positive outcome, a painstaking project by project type approach, although more time consuming and costly, is the best way to go about it.

80057-2

Impacts and Mitigations

Significance was not defined.

Significance was not thoroughly defined in and instead, a general list of possible impacts was included.

The general list outlined in chapter 5 seemed fairly comprehensive, but again, this was merely a broad list of possible impacts that could result from a wind energy development project. The only possible use for this list would be to get the thought process going for

80057-3

80057-4

when the actual project specific DEIS comes through. I hope that project specific EIS's aren't intended to be avoided if the proposed amendments are adopted. Criteria for when a project-specific EIS is required should be included in the PEIS.

80057-4
(cont.)

Mitigations not defined.

80057-5

Extensive studies that are location and project specific would be necessary to conclude anything appropriate to the mitigation of environmental impacts. All of the statements regarding mitigation measures contain the word "should", but this leaves the end result open-ended as to whether or not all of the proposed mitigations will actually be followed. With the major development and infrastructure that are required for these types of projects, it is impossible to mitigate all of the resulting impacts. However, I think that with careful planning and design many negative impacts could be minimized.

80057-6

Technical Information

Little data and few studies were reviewed and analyzed pertaining to environmental impacts and mitigations. Data determining where wind resources are available, and were reviewed, but how wind turbines in the past have affected flying wildlife.

80057-7

I could not find any considerations on how to modify the design of turbines to remedy the problem of killing flying wildlife. Maybe protective cages could be placed around turbine blades similar to household fans. Although, this may cut down on the wind potential of the blades. Mitigations in this DPEIS should include funding for studies that would find and evaluate mitigation measures.

Conclusion

This DPEIS appears to be purely administrative with a goal to amend many land use plans in order to expedite the wind energy development process.

80057-8

These administrative changes should not be used to bypass important mitigations of significant environmental impacts.

Responses for Document 80057

- 80057-001:** The PEIS is a programmatic evaluation and does not evaluate site-specific issues (see Section 1.2, Scope of the Analysis). 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.
- This information used in the analyses in the PEIS was derived from comprehensive reviews of wind energy development activities; published data regarding wind energy development impacts; existing, relevant mitigation guidance; and standard industry practices (see the 1st paragraph in Chapter 5, Potential Impacts of Wind Energy Development and Analysis of Mitigation Measures). Section 8, References, lists the references used in the preparation of the PEIS.
- 80057-002:** Thank you for your comment. We appreciate your input and participation in the public review process.
- 80057-003:** In a programmatic analysis such as the Wind PEIS, which considers potential impacts over an 11-state study area, it is not valid to define the significance of impacts at specific locations. The significance of potential impacts and the effectiveness of mitigation measures that might be implemented will be determined by site-specific and project-specific factors. 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. Through this process, the BLM will assess the significance of potential impacts and appropriate mitigation measures. The result will be the development of project-specific stipulations for incorporation into the POD.
- 80057-004:** The PEIS is a programmatic evaluation and does not evaluate site-specific issues (see Section 1.2, Scope of the Analysis). 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. As stated in the 9th bullet under Section 2.2.3.1, Proposed Policies, the level of environmental assessment required will be determined at the Field Office level. In certain instances, it may be determined that a tiered EA is appropriate in lieu of an EIS.

- 80057-005:** Mitigation is defined in the Glossary (Chapter 10). Specific mitigations are identified in the PEIS to the extent it is possible to do so at a programmatic level. Site-specific and species-specific mitigations must be addressed at the individual project level.
- 80057-006:** 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.
- 80057-007:** This information used in the analyses in the PEIS was derived from comprehensive reviews of wind energy development activities; published data regarding wind energy development impacts; existing, relevant mitigation guidance; and standard industry practices (see the 1st paragraph in Chapter 5, Potential Impacts of Wind Energy Development and Analysis of Mitigation Measures). Section 8, References, lists the references used in the preparation of the PEIS.
- Consideration of how to modify turbine designs does not fall within the scope of the PEIS.
- 80057-008:** The PEIS is a programmatic evaluation and does not evaluate site-specific issues (see Section 1.2, Scope of the Analysis). 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.

Document 80058**WindEISArchives**

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 12:41 AM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80058

Thank you for your comment, John Curtis.

The comment tracking number that has been assigned to your comment is 80058. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 12:41:23AM CDT

Wind Energy EIS Draft Comment: 80058

First Name: John
Last Name: Curtis
Address: 2233 S 1700 E
City: SaltLakeCity
State: UT
Zip: 84106
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Please pursue development of 'cleaner' & 'greener' means of energy creation. In particular wind & solar power sources. Funding on a national level for encouraging individual participation in 'green' programs, similar to the rebates and tax credits for installing updated & more effiecent furnaces, windows, & water heaters.

I fully support wind energy creation.
J Curtis

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

80058-1

Response for Document 80058

80058-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80059

WindEISArchives

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 12:55 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80059



Doc1_80059.doc
 (430 KB)

Thank you for your comment, joe little coyote sr..

The comment tracking number that has been assigned to your comment is 80059. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 12:55:01PM CDT

Wind Energy EIS Draft Comment: 80059

First Name: joe
 Middle Initial: d
 Last Name: little coyote sr.
 Organization: eda & doe
 Address: cheyenne ave
 Address 2: P.O. box 128
 City: Lame Deer
 State: MT
 Zip: 59003
 Country: USA
 Privacy Preference: Don't withhold name or address from public record
 Attachment: A:\Doc1.doc

Comment Submitted:

The Northern Cheyenne Tribe is a sovereign Indian Tribe organized under the Amended Constitution and Bylaws & Corporate Charter approved pursuant to the Indian Reorganization Act of 1934, 25 U.S.C. subsec. 461 et. seq., and the Act of June 18, 1934, 48 stat. 984, the Tribal Council being the governing authority of the Tribe, is responsible for establishing policy and creating conditions that foster and promote the socio-economic well being of its members. In these regards, on the 2nd day of July, 2001, the Tribal Council adopted its Comprehensive Economic Development Strategies Planning Document, Resolution No. DOI-184(2001), which set a Renewable Energy Development direction for the Tribe. Pursuant to this, the Tribe has completed a Wind Resource feasibility study with findings that the Tribe has commercial scale winds and is in process of developing a business plan with which to raise "investment capital financing" to undertake a 30 MW Wind Project. This was made possible with two DOE Grants amounting to over one million dollars (feasibility & development). It is requested the federal government and its instrumentalities make every possible means available to see that its investment into our Wind Project -- bears fruit. Given its scant financial resources The Tribe is not able to provide Capital to finance said Project. The availability of BLM Lands that could be used by Indian Tribe's to develop wind resources to stimulate their economies is certainly a constructive and productive initiative that can only benefit the economic health and security of this country, and creat new taxes to meet the many pressing needs of the country, not to mention the great potential for addressing environmental concerns. The only concerns we have are potential impacts to the historical and Native American cultural resources that might be found in these land areas. In this regard, we would be very interested that we no longer be treated as recipients of what ever the federal government plans, but rather we would like to be given the opportunity to be full participants in the planning and implementation of any Projects or initiatives being underatken that would involve lands that were historically and culturally used by our Tribe. The Tribe is

80059-1

80059-2

heartened to see the federal government use a "Capital Economic Development Model" to stimulate the national economy as well as providing opportunities to Indian Tribe's to become contributing forces to the economic health and security of this country.

80059-2
(cont.)

Thank You,

Eugene Little Coyote, President
Northern Cheyenne Tribe

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

TRIBAL COUNCIL OF THE NORTHERN CHEYENNE TRIBE
NORTHERN CHEYENNE RESERVATION
LAME DEER, MONTANA

RESOLUTION NO. DOI - 184(2001)

A RESOLUTION OF THE NORTHERN CHEYENNE TRIBAL COUNCIL
APPROVING THE COMPREHENSIVE ECONOMIC DEVELOPMENT
STRATEGIES PLANNING DOCUMENT FOR FISCAL YEAR 2001.

WHEREAS: the Northern Cheyenne Tribe is a federally recognized sovereign American Indian Tribe, organized under an Amended Constitution and Bylaws and Corporate Charter pursuant to the Indian Reorganization Act of 1934, 25 USC subsec. 461 et. Seq., approved by the Secretary of the Interior on May 31, 1996, the Tribe Council being the governing authority for the Tribe, is responsible for establishing policy and creating conditions that foster the socio-economic well being of its members; and

WHEREAS; pursuant to Tribal Council Resolution No. DOI - 016(2000), adopted on November 15, 1999, approving the submission of an application for a \$35,000 Planning Assistance Grant from the Economic Development Administration (EDA) of the U.S. Department of Commerce, that as part of the ongoing grant award, an update of the Comprehensive Economic Development Strategy (CEDS) is required; and

WHEREAS; accordingly, the Tribal Council has identified the goals, objectives and priorities which have been incorporated into the updated CEDS Planning Document dated June 30, 2001 which shall serve as an economic development guide for the Northern Cheyenne Tribe; now -

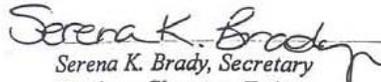
THEREFORE BE IT RESOLVED by the Northern Cheyenne Tribal Council the attached CEDS Planning Document dated June 30, 2001 is hereby approved.

PASSED, ADOPTED AND APPROVED by the Northern Cheyenne Tribal Council by nine (9) votes for passage and adoption and zero (0) votes against passage and adoption this 2nd day of July, 2001.



for Geri Small, President
Northern Cheyenne Tribe

ATTEST:


Serena K. Brady, Secretary
Northern Cheyenne Tribe

Responses for Document 80059

- 80059-001:** Valuable wind resources on Tribal lands may be available for commercial development in a manner similar to the Proposed Action or the Interim Wind Energy Development Policy described in Appendix A. Financing for commercial development on Tribal lands would be an obligation of the developer, and the Tribe would realize a financial return in the form of rentals, including minimum rentals and production rentals as well as other payments that it may require. For a Tribe to develop wind resources on BLM-administered lands, the Tribe would need to obtain a ROW authorization from the BLM.
- 80059-002:** The text at Section 2.2.3.2.2 and at Section 5.12.5 describes how the BLM will address your concerns regarding the full participation of Native American Tribes in the process through government-to-government consultations, as well as opportunities for public involvement.

Document 80060**WindEISArchives**

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 1:17 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80060

Thank you for your comment, SANDRA JONES.

The comment tracking number that has been assigned to your comment is 80060. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 01:17:15PM CDT

Wind Energy EIS Draft Comment: 80060

First Name: SANDRA
 Middle Initial: A
 Last Name: JONES
 Organization: KAMALANI DEVELOPMENT CORPORATION
 Address: P O BOX 1593
 City: KAILUA KONA
 State: HI
 Zip: 96745
 Country: USA
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

We need to be looking to alternative, clean, renewable sources for our electric power. Wind farms would provide this source and a clean backup system is possible. We are continuing to use and demand use of more and more each year. Buying it from offshore countries is no longer a sensible option for the U.S.A.

80060-1

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 80060

80060-001: Thank you for your comment. We appreciate your input and participation in the public review process.

Document 80061**WindEISArchives**

From: windeiswebmaster@anl.gov
Sent: Thursday, December 09, 2004 1:26 PM
To: WindEISArchives
Subject: Wind Energy EIS Comment 80061

Thank you for your comment, Autumn Radle.

The comment tracking number that has been assigned to your comment is 80061. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: December 9, 2004 01:26:09PM CDT

Wind Energy EIS Draft Comment: 80061

First Name: Autumn
 Last Name: Radle
 State: ##
 Country: USA
 Email: #####
 Privacy Preference: Withhold address only from public record

Comment Submitted:

To Whom It May Concern:

I would like to express my support for the Draft EIS including its conclusions to pursue the proposed action. Any steps we can take on any level of government to support renewable energy and reduce our dependence on foreign oil as well as polluting energy sources such as coal will go along way towards protecting our resources for future generations. I will look to seeing wind energy projectd developed on BLM lands - and hopefully on USFS lands in the future. It's a far better use of the land than oil drilling, mining, logging and grazing.

80061-1

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