

# Minnesota Department of Natural Resources

500 Lafayette Road • St. Paul, MN • 55155-4037



Comment# 0001

November 7, 2008

Upper Great Plains Wind Energy Programmatic EIS Scoping  
Argonne National Laboratory  
9700 S. Cass Ave. – EVS/900  
Argonne IL 60439

RE: Notice of Intent to Prepare a Programmatic Environmental Impact Statement to Evaluate Wind Energy Development in the Upper Great Plains Region, and to Conduct Scoping Meetings

Dear Sir or Madam:

The Minnesota Department of Natural Resources (MDNR) has reviewed the Notice of Intent published in the September 11, 2008 *Federal Register*, and submits the following comments for your consideration.

The Programmatic Environmental Impact Statement (PEIS) should identify additional research needs in the area of natural resource impacts of wind development. The PEIS could also identify potential funding mechanisms to support this research.

Information on Threatened and Endangered Species is not always complete. As part of preparing an ESA Section 7 evaluation, include provisions for surveys if species information and locations are not known.

An adaptive management approach that allows modification of mitigation measures is a good feature especially when information on impacts is not complete. The PEIS should describe who would carry out the monitoring responsibilities, and how those results might be made available to resource agencies.

The Notice of Intent states that the PEIS will define thresholds for significant direct, indirect and cumulative environmental impacts from wind-energy developments and associated transmission system enhancements to support the impact analysis in the programmatic EIS. MDNR recommends those thresholds should be considered both in terms of habitat lost and species mortality. The PEIS should define spatial and temporal scales at which thresholds will be assessed.

Thank you for the opportunity to provide comments on the PEIS scope. We look forward to review the Draft PEIS, once published.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Langan".

Matt Langan, Environmental Planner  
Environmental Review Unit  
Division of Ecological Resources  
(651) 259-5115

