

Thank you for your comment, Kathleen Zimmerman.

The comment tracking number that has been assigned to your comment is UGPW_S50015.

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Upper Great Plains Wind PEIS

Comment ID: UGPW_S50015

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Attachment: NWF Scoping Comments for WAPA-FWS Wind PEIS FINAL.pdf

Comment Submitted:

[See Attachment.](#)



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November 10, 2008

WAPA/FWS Wind Energy PEIS, Scoping
Argonne National Laboratory
9700 South Cass Avenue -- EVS/900
Argonne, Illinois 60439

Delivered via electronic and regular mail

Re: Scoping Comments for the Upper Great Plains Wind Energy Programmatic Environmental Impact Statement

To Whom It May Concern:

These comments are submitted on behalf of the National Wildlife Federation (NWF). NWF appreciates the opportunity to submit these comments to the Western Area Power Administration and the Fish and Wildlife Service [hereinafter Agencies]. NWF is submitting these comments today electronically and forwarding a copy separately by mail.

As an organization, NWF represents the power and commitment of four million members and supporters joined by affiliated organizations in 47 states and territories and the District of Columbia. NWF and its affiliates have a long history of working to conserve the wildlife and wild places in the West. Many members of NWF and its affiliates use the lands and resources that will be impacted by utility-scale wind energy generation facilities; they also use and enjoy wildlife resources that may be impacted by construction of these facilities on federal lands, as well as state, private and tribal lands. In 2004, NWF members adopted two resolutions regarding the siting of wind energy facilities. Resolution No. 2004-12 specifically adopted criteria from guidelines adopted by the Fish and Wildlife Service (FWS) in 2003.¹

NWF also recognizes that global warming poses an enormous threat to both the human environment and the earth's biologic diversity. For that reason, NWF has called for a rapid transition to energy sources other than fossil fuels that contribute to greenhouse gas

¹ A copy of NWF Resolution No. 2004-12 is attached as Appendix A.

(GHG) emissions and global warming. The generation of electricity via wind is an important component of that transition. Without immediate and decisive steps to curb GHG emissions, the long-term survival of many wildlife species is in jeopardy.

NWF urges the Agencies to learn from the known impacts of oil and gas development and other human activities in vital wildlife habitats. Development of utility-scale wind energy generation facilities will transform the lands upon which they are located and may preclude other uses. An inappropriately sited and constructed wind energy facility has the potential to cause significant damage to the environment and to eliminate wildlife habitat. Accordingly, it is crucial that Agencies commit to avoiding sensitive wildlife habitats and consider maximizing use of existing infrastructure in siting these facilities. For this reason, NWF is pleased to see these two federal agencies collaborate on this effort to support the production of clean, renewable energy in a manner that conserves wildlife both now and for the future.

The Agencies should use the Upper Great Plains Wind Energy Programmatic Environmental Impact Statement (UGP Wind Energy PEIS) to narrow the task of siting responsible construction of wind energy generation facilities by delineating areas or conditions where construction of such facilities would be unsuitable, determining areas or conditions where construction should be avoided, and by establishing best management practices (BMPs) for the construction and operation of such facilities on both public and private lands.

The final PEIS should include a commitment to conduct site-specific environmental impact analyses when individual locations and proposed uses are identified. This programmatic document should concentrate instead on the general effects of wind energy generation facilities and identify wide-ranging measures for avoiding or mitigating those effects. It should establish thresholds for the impacts of wind energy development on important resources, including wildlife. Once those thresholds are neared, additional development should require additional mitigation. A similar approach was taken by the Department of the Interior in its Final Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States (BLM Wind Energy PEIS) released in June 2005. NWF urges the Agencies to adopt the same methodology here. NWF believes this approach will afford opportunities to expedite review and approval of individual projects.

DESIGNATION OF EXCLUSION AREAS AND AREAS OF AVOIDANCE

The Upper Great Plains contains vast tracts of dry-land farmland that could be acquired without significant cost to potential wind energy developers. Given the abundance of this private farmland resource, NWF believes that wind development on public lands should only be considered once developers have exhausted their opportunities for constructing a wind facility on private lands.²

² At a minimum, the UGP Wind Energy PEIS should include an alternative that avoids placing facilities on federal public lands where possible.

The BLM Wind Energy PEIS specifically acknowledged the importance of keeping development out of special federal lands and identified areas where wind energy development would not be authorized. The BLM Wind Energy PEIS excluded all Wilderness, National Landscape Conservation System lands, and Areas of Critical Environmental Concern from consideration for development of wind energy facilities.

Additional exclusion areas for wind energy development should include: National Parks; National Wildlife Refuges; National Monuments; National Conservation Areas; National Historic and National Scenic Trails; National Wild, Scenic, and Recreational Rivers, as well as rivers and river segments under study or considered eligible for such designations; Roadless Areas; and threatened, endangered and sensitive species habitat, as well as other important wildlife habitats and migration linkages on both public and private lands.

Avoidance of important wildlife habitats poses a significant challenge in the Upper Great Plains study area. FWS Region 6 includes some of the largest intact tracts of native prairie and highest wetland densities, making it some of the most productive waterfowl habitat in North America. NWF is concerned that global warming's impacts on these prairie pothole habitats will be severe even with drastic reductions in current GHG emissions. These riparian areas must be preserved because of their ecological significance both now and in the future.³

The UGP Wind Energy PEIS should address whether lands that are already impaired be considered first for proposed wind energy development. The Agencies should encourage the use of existing infrastructure within already disturbed areas as much as possible. There are enormous advantages to this approach. It will reduce the overall financial costs of projects from planning to construction to maintenance. It will reduce impacts to wildlife and sensitive lands. Projects should also be sited to take advantage of existing transmission capacity, minimize power loss during transmission, and minimize the construction of new transmission infrastructure.

BEST MANAGEMENT PRACTICES

The UGP Wind Energy PEIS should provide for the thorough evaluation of impacts to avian species -- especially migratory birds, raptors and bats -- and important flyways and raptor concentration areas. The PEIS should ensure that project siting and design minimize bird and bat mortality. The PEIS should include standards that ensure that projects are sited to avoid key migration routes of both birds and bats. Since sage-grouse and other prairie-nesting species tend to avoid overhead structures, turbines and power lines should not be constructed near breeding, nesting, or winter concentration areas.

³ See FWS, Interim Guidelines To Avoid And Minimize Wildlife Impacts From Wind Turbines (May 2003) at 4 [found at <http://www.fws.gov/habitatconservation/Service%20Interim%20Guidelines.pdf>] (“Turbines shall not be constructed in wetlands, including lakes, ponds, marshes, sloughs, swales, swamps, or potholes.”).

The PEIS should also ensure through adoption of BMPs that the siting and design of turbines, supports, and associated power lines avoid creating perching opportunities for birds. Raptors use human-made perches to prey on prairie-nesting species. In this regard, columns are generally better than lattice towers, and power lines should be buried to avoid both perching and electrocution. The PEIS should include standards to ensure that turbines are not placed on escarpment edges, as well as standards to ensure that the sweep point of the blades of any wind development project is higher than the apex of nuptial flights for birds in the area. NWF urges the Agencies to carefully consider the potential impacts to birds and bats and the mitigation measures suggested in research conducted by Western EcoSystems Technology, Inc. See www.west-inc.com/wind_reports.php.

Assessment of the wildlife impacts of wind energy often focus exclusively on the potential avian mortalities caused by collisions with turbines. However, the large footprints of wind energy facilities will have significant impacts on many wildlife species. NWF urges the Agencies to adopt BMPs intended to avoid additional fragmentation of wildlife habitat. The UGP Wind Energy PEIS must include an analysis of the existing degree of fragmentation on the lands under consideration, its impact on wildlife, and appropriate locations for wind energy generation facilities that will avoid such habitat losses. NWF notes that FWS's own Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines recommend that wind energy projects:

[a]void 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.⁴

At a minimum, the Agencies should adopt limits on the amount of disturbed acreage permitted within certain habitat types.

In addition to the footprint of the infrastructure itself, the encroachment of cheat grass and other invasive weeds that often follow development of roads and soil disturbance associated with construction and operation of wind energy facilities will negatively affect wildlife habitat. Avoiding habitat fragmentation will reduce opportunities for the spread of invasives; however, the Agencies should adopt additional BMPs specifically directed at preventing the proliferation of these species.

With respect to the Fish and Wildlife Service, NWF is concerned about the conversion of lands specifically set aside for wildlife habitat to wind energy development. The

⁴ FWS, Interim Guidelines To Avoid And Minimize Wildlife Impacts From Wind Turbines (May 2003) at 4 [found at <http://www.fws.gov/habitatconservation/Service%20Interim%20Guidelines.pdf>]. Additional information on the impacts of wind energy facilities can also be found in The Wildlife Society's *Impacts of Wind Energy Facilities on Wildlife and Wildlife Habitat* published in September 2007 and the National Research Council's report *Environmental Impacts of Wind-Energy Projects* also published in 2007.

grassland and wetland easements held by FWS represent a significant taxpayer investment in conservation that should not be jeopardized. Any plan to exchange these conservation easements in order to permit construction of turbines or transmission lines should be based upon ensuring that wildlife populations and habitat functionality are preserved. Acre-for-acre or “fair market value” exchanges may not achieve this goal. Habitat acquisition should prioritize replacement of ecological values. New acquisitions should also be based upon an assessment of their value to wildlife in a changing climate.

The Western Area Power Administration (WAPA) should identify and eliminate any system impediments to wind energy generation. It should explore ways to enhance its support of wind energy generation. It must also adopt criteria that would render some projects on federal, tribal, state, and private lands unsuitable for WAPA assistance, including a determination that WAPA interconnection may not be available for facilities proposed within important wildlife habitats. BMPs to conserve wildlife habitat should be included in all WAPA contracts. NWF believes that the adoption of BMPs and other habitat conservation measures will reduce public resistance to wind energy facilities and promote the expansion of this important renewable energy source.

CONCLUSION

NWF urges the Agencies to proceed expeditiously in the completion of the UGP Wind Energy PEIS and to adopt programs that will facilitate the development of this critical resource. Global warming is a crisis of for which solutions must be implemented now. NWF thanks you for the opportunity to provide input regarding the development of wind energy programs for these Agencies. NWF looks forward to reviewing the draft PEIS when it is completed.

Sincerely,



Kathleen C. Zimmerman
Senior Land Stewardship Policy Specialist

APPENDIX A

National Wildlife Federation Resolution 2004-12

Name Support For Sound Siting Guidelines For Wind Generators

Date Mar 12, 2004

Description Number: 2004-12

WHEREAS, wind generation is a renewable source of energy; and

WHEREAS, it is in the public interest that the nation's energy sources transition away from nonrenewable fossil fuel resources in order to provide for cleaner air, cleaner water, energy independence, and improved public health, and to reduce the damage of global warming and associated climate changes; and

WHEREAS, wind generators and their associated support and access infrastructure are being promoted and developed on public as well as private land; and

WHEREAS, most wind generator developments are not adequately regulated for their impacts to wildlife and the environment; and

WHEREAS, there are appropriate areas to develop commercial wind generator facilities (such as cropped fields and highly developed industrial type landscapes) and there are areas that are inappropriate for development due to potential negative impacts to wildlife (native grasslands, sage steppes); and

WHEREAS, wind generation facilities can negatively impact wildlife and wildlife habitat including: migration corridors, staging/concentration areas, and breeding and brood-rearing areas, especially when constructed in native grasslands; and

WHEREAS, the United States Fish and Wildlife Service (USFWS) adopted Interim Guidance on Avoiding and Minimizing Wildlife Impacts from Wind Turbines that includes the following criteria:

- Avoid placing turbines in documented locations of any species of wildlife, fish or plant protected under the Federal Endangered Species Act.
- Avoid locating turbines in known local bird migration pathways or in areas where birds are highly concentrated unless mortality risk is low (e.g. birds present rarely enter the rotor-swept area).
- Configure turbine locations to avoid areas or features of the landscape known to attract raptors.
- Avoid fragmenting large, contiguous tracts of wildlife habitat. Wherever possible place turbines on lands already altered or cultivated, and away from areas of intact and healthy native habitats.
- Avoid placing turbines in habitat known to be occupied by prairie grouse or other species that exhibit extreme avoidance of vertical features or structural habitat fragmentation.
- Minimize roads, fences and other infrastructure.

WHEREAS, property tax exemption and production tax credit for wind generation facilities granted by federal and state legislation often promote facility construction on private lands regardless of the impacts on wildlife,

NOW, THEREFORE, BE IT RESOLVED that the National Wildlife Federation, at its annual meeting assembled March 11-13, 2004, in St. Louis, Missouri, urges that all commercial wind generator development proposals be evaluated in a public process to determine whether they meet the USFWS criteria above; and

BE IT FURTHER RESOLVED that NWF encourages state and local governments, federal agencies, and other appropriate agencies to not issue permits for wind generator development proposals that do not meet the USFWS criteria above.