

Thank you for your comment, Aimee Delach.

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Upper Great Plains Wind PEIS  
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Attachment: Wind PEIS comments.rtf

Comment Submitted:

10 November 2008

WAPA/FWS Wind Energy Programmatic EIS Scoping  
Argonne National Laboratory  
9700 S. Cass Avenue-EVS/900  
Argonne, IL 60439

Delivered via website submission: <http://plainswindeis.anl.gov>

Dear Sirs:

Defenders of Wildlife is pleased to submit the following comments in response to the Western Area Power Administration and Fish and Wildlife Service's scoping notice regarding their intent to prepare and Environmental Impact Statement regarding wind energy development in the Upper Great Plains region (73 FR 52588). Defenders is a national conservation organization dedicated to the protection of all native wildlife and plants in their natural communities. With more than 1 million members and activists, Defenders of Wildlife is a leading advocate for innovative solutions to safeguard our wildlife heritage for years to come. Defenders of Wildlife has a long involvement with wildlife and windpower issues, including participation in the National Wind Coordinating Collaborative and membership on the Fish and Wildlife Service's Federal Advisory Committee on creating guidance for wind power siting with respect to wildlife concerns.

Defenders of Wildlife supports a comprehensive approach to wind power siting that looks at both landscape level habitat issues and siting issues at the individual project level. We also recognize the importance of integrating analysis of transmission impacts along with studying the impacts of wind power generation. WAPA/FWS have initiated this with their proposed approach of defining areas of high potential for wind-energy development; defining natural and human environment resources in areas of high wind-energy development; recommending mitigation measures; completing an ESA section 7 consultation for listed and proposed threatened and endangered species; implementing adaptive management; defining thresholds for environmental impacts; evaluating laws, regulations and policies; and defining transmission line enhancements. Here, we propose a framework for evaluating wind and wildlife considerations, as well as specific recommendations for issues that should be included in the proposed approach.

Proposed framework: Adopt a tiered, risk assessment approach to evaluating wind and wildlife issues, starting with the landscape level.

The National Wind Coordinating Committee (NWCC), through its in-process revision of the its "Studying Wind Energy/Bird Interactions" methods and metrics guidance document (Anderson et al. 1999), and the Wind-Wildlife Federal Advisory Committee (FACA), are both moving forward with a risk-assessment approach to wind power siting with respect to wildlife concerns. We believe that following a risk assessment framework will allow maximal development of wind as a clean, renewable energy resource, while minimizing adverse impacts to wildlife.

The details of this framework are still under consideration by the NWCC and the FACA, Defenders can present some of the

general principles, which we recommend for adoption in the EIS process. First, the framework follows the FWS goal of mitigating impacts by 1) avoiding; 2) minimizing, and 3) compensating for those impacts that occur despite efforts to avoid and minimize. Second, the frameworks seek to mitigate several types of potential impacts to wildlife, including collisions, non-collision decompression fatality (recently recognized as a source of bat mortality); habitat fragmentation, and displacement of species sensitive to anthropogenic presence in general, and roads and tall structures in particular. Third, the framework will apply to a broad array of wildlife species, including but not limited to species covered by the Endangered Species Act, species protected by the Migratory Bird Treaty Act, as well as wildlife not specifically defined as Federal trust resources, but fall within the purview of the states. Bats are an important example of the latter type. Finally, the framework follows a tiered approach that draws from landscape-level mapping exercises, previously identified important habitats, and existing information about wildlife species to help avoid areas of high importance to wildlife, identify questions for further investigation, make siting and micrositing decisions, assess mortality and displacement effects, and plan for adaptive management measures.

An important aspect of this framework is that it brings wildlife and habitat considerations into the siting process very early. As we envision it, the developer would look at landscape level issues (at very little time and resource cost, because it utilizes existing data), before even raising a met tower. Furthermore, communication with wildlife agencies and characterization of site wildlife risk would occur long before significant irreplaceable resources have been committed to the site. We urge that the EIS recognize the importance of early coordination on wildlife and habitat issues.

The work of the Federal Advisory Committee and details of the tiered risk framework, as they emerge, will be posted at the FAC website:

[http://www.fws.gov/habitatconservation/windpower/wind\\_turbine\\_advisory\\_committee.html](http://www.fws.gov/habitatconservation/windpower/wind_turbine_advisory_committee.html)

Specific recommendations regarding WAPA/FWS proposed approach:

Defining areas of high wind power potential: Extensive work has already been done to identify areas of high wind potential. Efforts connected to the EIS should complement and refine, not repeat, existing data.

Defining natural and human environment resources within areas of high wind power potential:

The framework proposed above outlines a process for identifying important wildlife and habitat areas and making siting decisions with respect to wildlife concerns. We recommend that the PEIS adopt this framework and utilize existing mapping and landscape analysis tools, as well as providing methods and metrics for evaluating wildlife risk at the individual site level. Specifically, we recommend that the EIS make full use of existing sources of information in order to comprehensively identify areas of important wildlife and habitat resources. Important resources include that the EIS should utilize include:

- maps of critical habitats of listed species,
- important bird areas as identified by the National Audubon Society and the the American Bird Conservancy
- Nature Conservancy maps of important habitats
- Habitats identified in comprehensive state wildlife conservation strategies
- State Natural Heritage data
- National Wetlands Inventory data
- National Wildlife Refuges and state wildlife conservation area

Landscape level analysis is an important coarse filter that can potentially identify "red flags" where projects would incur excessive collision risks to birds, bats or endangered species; map habitat areas that would be sensitive to fragmentation and disturbance; and provide a guide about sites that should be avoided because of these concerns.

Recommending mitigation measures/ implementing adaptive management

Defenders of Wildlife urges that the EIS adopt a broad view of mitigation, that includes avoiding impacts where possible, minimizing impacts where they cannot be avoided, and compensating for impacts that occur despite efforts to avoid and minimize. Mitigation can and should occur at all levels, from initial coarse-filter analysis, to individual site screening, preconstruction assessment, site selection, site design and turbine micrositing, construction and operations. While we advocate for a landscape level approach as described above, all geographic data has limitations of scale, timing and quality, so the EIS should provide for site-level investigations of habitat quality.

Using the broad definition of mitigation, adaptive management can also be considered to be a form of mitigation, to the extent that management decisions regarding lighting, cut-in speed, land management activities near turbines, and other practices can help to minimize direct mortality. Therefore, we recommend that the EIS should discuss adaptive management within the context of mitigation and not as a separate concept.

Compensatory mitigation, for instance, restoration and protection of an area to compensate for lost habitat, should be considered in the EIS. However, in certain important habitat areas, particularly those supporting species that are sensitive to disturbance or fragmentation, it may not be possible to functionally compensate for lost habitat. In these situations, prohibition of wind development is appropriate. Defenders anticipates that areas of outright prohibition will constitute a small portion of the landscape; and long-term protection of these areas should be a priority.

Completing an ESA section 7 consultation

Defenders supports ESA section 7 consultation where for listed and proposed threatened and endangered species are present at any time of the year.

Defining thresholds for environmental impacts;

Defining thresholds for environmental impacts is a notoriously difficult task. Assessing cumulative impacts of multiple wind facilities, over long time frames, and of wind facilities and other landscape changes, is even more difficult. Defender of Wildlife believes that adopting a risk-assessment framework with a landscape level habitat analysis component is the best way to reduce the impact of each individual facility. If used consistently, this framework will help to lower cumulative impacts over time and space.

Evaluating laws, regulations and policies

We urge that the drafters of the EIS be cognizant of the requirements of the full suite of wildlife laws, including but not limited to the Endangered Species Act, the Migratory Bird Treaty Act, and state, local and tribal wildlife laws and regulations. Further, the EIS should complement, not conflict with, the existing windpower siting guidelines that the various states in the region have already produced.

Defining transmission line enhancements

Defenders of Wildlife recognizes that enhancement of the existing transmission system will be an important prerequisite to the scaling up of wind power generation in the northern plains states. This fact has been described in detail by the National Renewable Energy Lab and others. Defenders of Wildlife urges that new transmission line planning also follow a landscape level habitat analysis in order to avoid fragmenting and disturbing sensitive and important habitats. While the risk assessment framework we have outlined does not specifically deal with transmission siting, we believe it can be adapted for this purpose with little difficulty. New transmission lines should also be designed and built according to Avian Power Line Protection Plan standards.

Thank you for your attention to the scoping comments of Defenders of Wildlife. We look forward to working with you further as the EIS proceeds.

Sincerely,

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