

Thank you for your comment, Robert S Lynch Lynch.

The comment tracking number that has been assigned to your comment is UGPW_S50018.

Comment Date: November 10, 2008 15:30:28PM

Upper Great Plains Wind PEIS

Comment ID: UGPW_S50018

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Attachment: Wind Energy Prog EIS 111008.doc

Comment Submitted:

[See Attachment.](#)

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SUBMITTED ELECTRONICALLY

November 10, 2008

WAPA/FWS Wind Energy Programmatic EIS Scoping
Argonne National Laboratory
9700 S. Cass Avenue – EVS/900
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Re: Programmatic Environmental Statement to Evaluate Wind Energy Development in Western's
Upper Great Plains Region

Ladies and Gentlemen:

We are submitting comments as invited in your September 11, 2008 Federal Register notice (73 Fed.Reg. 52855, et seq.). We would not ordinarily comment on a programmatic EIS for activity in the Upper Great Plains Region but this programmatic EIS concept will set a precedent for other similar environmental screenings in other areas within which Western transmits power.

Having not attended either of the published scoping meetings, we cannot say whether either of the presentations made or the comments received included those with regard to cost. That is an element that must be analyzed in the EIS and we hope that it will be fully and fairly explicated in the draft EIS you intend to publish next year. Both the order of magnitude of costs for mitigation and other environmental requirements as well as those costs associated with bringing wind resources into the existing transmission system and, possibly, building new transmission should be clearly addressed at the outset.

Furthermore, the cumulative impacts, when dealing with a programmatic EIS, must include forecasts of future transmission needs and the likely location of those transmission resources. Without that kind of forecasting, there is no way to assess environmental impact, which is obviously site specific.

Another issue we would like to see addressed is whether wind integration impacts the possibility of solar or hydropower integration, both from existing and new facilities. This programmatic EIS is power generation type specific but its consequences are not.

Thank you for the opportunity to comment on this important programmatic EIS. Please include us as interested parties in future communications on the programmatic EIS process.

WAPA/FWS Wind Energy Programmatic EIS Scoping

November 10, 2008

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Sincerely,

/s/

Robert S. Lynch

Counsel and Assistant Secretary/Treasurer

RSL:psr

cc: Tim Meeks, Administrator, Western Area Power Administration
Mark Wieringa, NEPA Document Manager, Western Area Power Administration
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