

Thank you for your comment, Laurie Jodziewicz.

The comment tracking number that has been assigned to your comment is UGPW\_S50019.

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Upper Great Plains Wind PEIS  
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Attachment: 081110 Western PEIS scope - AWEA comments FINAL.pdf

Comment Submitted:

Attached please find the comments of the American Wind Energy Association (AWEA). [\\_\\_\\_\\_\\_](#)



**Comments of the American Wind Energy Association (AWEA)  
Notice of Intent to Prepare a Programmatic Environmental Impact Statement To Evaluate  
Wind Energy Development in Iowa, Minnesota, Montana, Nebraska, North Dakota, and  
South Dakota; Including the U.S. Fish and Wildlife Service's Landscape-Level Easement  
Program in North Dakota, South Dakota, and Eastern Montana; and To Conduct Public  
Scoping Meetings  
November 10, 2008**

The American Wind Energy Association (AWEA) applauds the leadership of the U.S. Department of Energy, Western Area Power Administration (Western) and the U.S. Department of the Interior, Fish & Wildlife Service (Service) for undertaking a Programmatic Environmental Impact Statement (PEIS) to evaluate issues associated with wind energy development in Western's Upper Great Plains Customer Service Region, and on the Service's landscape-level grassland and wetland easements in North Dakota, South Dakota, and eastern Montana. As requested in the Notice of Intent published in the *Federal Register* (Vol. 73, No. 177, 52855-52858), AWEA here provides comments on the proposed scope of the PEIS.

AWEA is the national trade association of America's wind industry, with more than 1,600 member companies including global leaders in wind power and energy development, wind turbine manufacturing, component and service suppliers, and the world's largest wind power trade show. AWEA is the voice of wind energy in the U.S., promoting renewable energy to power a cleaner, stronger America. More information on wind energy is available at the AWEA Web site: [www.awea.org](http://www.awea.org).

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*Lessons Learned from the U.S. Bureau of Land Management*

A PEIS is an important endeavor that can save valuable time and resources of federal agencies. A good example is the PEIS and Record of Decision (ROD) prepared in 2005 by the U.S. Bureau of Land Management (BLM) for its wind energy development program on certain western lands.

The BLM's preparation of its PEIS and ROD in 2005 can serve as a model for Western and the Service.<sup>1</sup>

The BLM's PEIS assessed the environmental, social and economic impacts associated with wind energy development on BLM-administered lands, and the ROD established policies and BMPs for the administration of wind energy development activities as well as minimum requirements

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<sup>1</sup> Another example is the 1995 Business Plan of the Bonneville Power Administration, which serves as a PEIS and streamlined the interconnection process. [http://www.efw.bpa.gov/environmental\\_services/Document\\_Library/bpsa/](http://www.efw.bpa.gov/environmental_services/Document_Library/bpsa/)

for mitigation measures. To the extent that the BLM's PEIS addressed issues and concerns associated with an individual wind energy project, including potential cumulative impacts, the BLM will "tier off" the analysis in the PEIS and limit the scope of additional, project-specific analyses under the National Environmental Policy Act (NEPA). The BLM's site-specific NEPA analyses include analysis of project site configuration and micro-siting considerations, monitoring program requirements, and appropriate site-specific stipulations. The BLM Wind Policy describes the scope of NEPA review required for the various types of BLM actions. For most projects, preparation of an Environmental Impact Statement (EIS) is not necessary.

In addition, the BLM's implementation of its PEIS and ROD since 2005 can also serve as a model for Western and the Service. For example, field and regional offices should have the necessary training and resources to be successful in accomplishing timely and appropriate reviews of individual projects, and access to qualified personnel at headquarters if resources available in the field or regional office are inadequate.

#### *Net Energy Capacity Threshold for EIS vs. EA*

It is our understanding that Western has a "trigger" that requires that any energy project that has a net capacity of more than 50 MW must carry out an EIS rather than an Environmental Assessment (EA), to comply with NEPA.<sup>2</sup> AWEA and its member companies do not believe that such an automatic trigger is necessary and that an EA "tiered off" the PEIS should be prepared for most energy projects rather than an EIS.

#### *Consultation with Native American Tribes*

Wind energy development companies have reported to AWEA that tribal consultations are complex and time-consuming. In accord with those concerns, AWEA recommends that the agencies involved with the PEIS consult with the Bureau of Indian Affairs on a programmatic level so that project consultations can potentially be more streamlined. Proactive outreach to individual tribes to determine their concerns is also recommended.

#### *Interaction with On-going Habitat Conservation Plan for Whooping Crane*

The Service and the wind energy industry have begun discussions about a potential region-wide Habitat Conservation Plan (HCP) for the whooping crane and potentially other protected species in the migration corridor of the Wood Buffalo-Aransas whooping crane flock, which extends from North Dakota to Texas. The Federal Register notice refers to intent to complete a section 7 consultation for listed and proposed T&E species within the study area boundaries. This PEIS may duplicate some of the work conducted for the HCP, and given the Service's resource constraints; the two efforts should be coordinated. AWEA respectfully requests that the Service define the relationship between these two efforts and take advantage of potential efficiencies. It is hoped that the preparation of this PEIS will not delay completion of the HCP in any way.

In addition, the Service should clarify the area the section 7 consultation will include, whether the "study area boundaries established for the PEIS" (as referenced in item #4 of the Notice of Intent) and "areas with a high potential for wind-energy development near UGP Region's transmission system" (as reference in item #1 of the Notice of Intent) are the same areas.

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<sup>2</sup> See Department of Energy NEPA implementation procedures (10 CFR Part 1021), Appendix C to Subpart D.

### *Area Identification and Mapping*

The Federal Register notice refers to the identification of transmission system enhancements. Please clarify whether this effort is part of the PEIS or a separate, parallel process.

AWEA is concerned that Western and the Service may attempt to map areas within the study area boundaries that may or may not be appropriate for wind development based on wildlife and habitat criteria. There are other efforts, such as a project underway by the Western Governors Association, to assemble some GIS-based information on renewable energy development; therefore, the Service and Western should not duplicate that work. Additionally, many mapping exercises quickly become weighed down by the quality of the various data sets used and the intricacies associated with combining such information. Western and the Service would be wise to focus, in this PEIS, on best management practices and mitigation methods rather than area-wide mapping or planning.

### *Defining Cumulative Impacts*

In the Federal Register notice, Western and the Service mention that the PEIS and program would: “Define thresholds for significant direct, indirect, and cumulative environmental impacts from wind-energy developments and associated transmission system enhancements ...” The task of defining acceptable thresholds for cumulative impacts is a daunting one. AWEA respectfully suggests that it would be a more efficient allocation of resources to focus on defining what variables should be addressed in such an analysis and how the process may work in individual project evaluations. And cumulative impacts should be defined to include impacts in the immediate vicinity of a proposed project, and only for operating projects, projects under construction and proposed projects for which permit applications have been filed.

### *Streamlining Decision Making*

The Federal Register notice states that the PEIS would create a streamlined approach for compliance (NEPA, National Historic Properties Act [NHPA], and ESA) for future site-specific wind development projects that involve Western interconnect and/or Service easements. AWEA commends Western and the Service in working to develop a more transparent, efficient, and consistent system for environmental review.