

Thank you for your comment, Janet Ellis.

The comment tracking number that has been assigned to your comment is UGPW\_S50021.

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Upper Great Plains Wind PEIS

Comment ID: UGPW\_S50021

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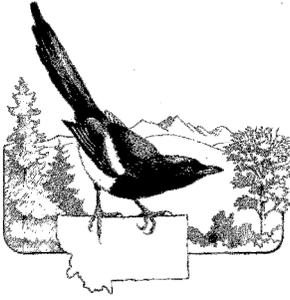
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Attachment: Audubon USFWS Wind PEIS Scope 11-08.pdf

Comment Submitted:

See the attached comments from Montana Audubon. [\\_\\_\\_\\_\\_](#)



# Montana Audubon

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November 10, 2008

WAPA/FWS Wind Energy Programmatic EIS Scoping  
Argonne National Laboratory  
9700 South Cass Ave-EVS/900  
Argonne, IL 60439

To Whom It May Concern,

Please accept the following comments from Montana Audubon on the *Notice of Intent to Prepare a Programmatic Environmental Impact Statement*. Montana Audubon is the coordinating entity for the nine Audubon Society Chapters in the state of Montana. Currently there are approximately 3,200 Audubon members in the state. Our mission is to protect birds and other wildlife, and their habitats. You may receive comments from other members of the Society.

The U.S. Fish and Wildlife Service (Service) is preparing a Programmatic Environmental Impact Statement (Programmatic EIS) to evaluate issues associated with wind energy development within Western's Upper Great Plains Customer Service Region (UGP Region), which includes Montana. The Programmatic EIS is slated to cover wide ranging issues, including Programmatic Section 7 consultation, defining thresholds for significant cumulative impacts, and defining mitigation measures that will be used to reduce the impacts from wind-energy development projects. Additionally, in Region 6, the Service is considering allowing wind projects to be developed on Service-held grassland and wetland easements.

Montana Audubon supports the development of alternative renewable energy sources such as wind energy. However, we do have concerns about projects on a site-specific basis because of the potential impact of wind turbines on birds, bats, species of special concern, and their habitats.

Consequently, we are asking that the Programmatic EIS address the following:

1. It is not realistic to expect that loss of wildlife habitat value and function as a result of conversion, disruption and fragmentation can be compensated for through mitigation measures. Therefore, the key to avoiding or eliminating impacts of wind power development on wildlife is site selection. An efficient approach to minimizing impacts to wildlife (in terms of time and expense and controversy) would be to pro-actively steer wind energy development toward sites with comparatively low wildlife habitat values. Selection of the best sites for wind power generation would be further enhanced by ruling out sites with known, outstanding wildlife values from consideration for wind power development. Otherwise, much time, effort, and money would be wasted trying to accomplish the impossible job of designing wind power developments at sites with obviously high and/or widely recognized wildlife values. In the long-term, public support of wind power generation as a wildlife-friendly, renewable source of power is dependent on wind power development on sites with comparatively low wildlife values, and therefore, relatively lower impacts on wildlife. For all of the aforementioned reasons we suggest an increased emphasis on pre-development planning and site selection including collection of baseline wildlife data. This statement originally appeared in some comments submitted by Montana Fish, Wildlife & Parks on

the BLM's Programmatic EIS on wind; this warning should also be followed in the Service's Programmatic EIS.

2. The Programmatic EIS should specifically identify areas where wind farms should not be allowed. Specifically, wind farms should not be located within two miles of:
  - National Wildlife Refuges;
  - State Wildlife Management Areas;
  - National or State Parks;
  - Designated Wilderness Areas and Wilderness Study Areas;
  - Designated Wild and Scenic Rivers;
  - Audubon-designated Important Bird Areas;
  - Large tracts of intact habitat, where roads and transmission lines are generally absent;
  - Areas with extensive hardwood draws;
  - Areas where species of conservation concern are concentrated, such as in prairie-dog towns and near Greater Sage-Grouse leks (NOTE: Greater Sage-Grouse leks may need a 5-mile buffer); and
  - Significant migration corridors for birds and bats.
  
3. The Programmatic EIS should identify wind farm sites that are more suitable from a wildlife perspective such as sites that:
  - Do not provide prime habitat for threatened or endangered species protected under the federal Endangered Species Act;
  - Are located away from water bodies (wetlands, streams, rivers, lakes), that attract larger numbers of birds and other wildlife (a setback should be developed for water bodies);
  - Are not located in an identified migratory corridor;
  - Do not fragment large tracts of intact habitat, especially those tracts identified as significant for wildlife species of conservation concern according to Montana Natural Heritage Program data or other survey data. Note that habitat is fragmented by roads, transmission lines, and other infrastructure development;
  - Do not fragment or degrade significant landscapes with special management status for wildlife or wilderness qualities;
  - Do not have significant prairie dog populations located in the project area or a 5-mile radius of the area, which will attract fewer raptors;
  - Do not have significant ground squirrel use of the area, which will also attract fewer raptors to the site; and
  - Have comparatively low diversity and abundance of resident birds (e.g. preference should be given to cropland areas).
  
4. The Federal Register (Vol. 73, No. 177, September 11, 2008) specifically states that, "Many of the impacts resulting from wind energy infrastructure development, including siting wind turbines, access, roads...are well known." It also indicates that mitigation measures and best management practices have been successfully developed that reduce impacts. We disagree with these assertions. It is very difficult to look programmatically at thresholds that will successfully anticipate and mitigate cumulative impacts from habitat fragmentation, especially to wildlife that evolved in a grassland ecosystem. Placing large towers in this ecosystem can have significant impacts through habitat fragmentation. Many of these species (many of which are species of conservation concern) abandon areas with large towers. The Greater Sage-Grouse also has a low tolerance for roads within five miles of a lek. As an example of the size and scale of wind farms under consideration in Montana, one wind farm claimed to physically disturb 726.7 acres of habitat. However, that farm would have fragmented over 20,000 acres of habitat in one of the largest blocks of native prairie remaining in the state. The Programmatic EIS needs to address how impacts from fragmentation will be identified and minimized. It is not an easy task.

5. In spite of the Programmatic EIS, we believe that site-specific environmental reviews (and in some cases EISs) will need to be done under the National Environmental Policy Act (NEPA) for individual wind projects. This site-specific analysis needs to require that all studies be completed prior to any environmental review, so that the public has access to information about the site-specific impacts that are expected. Environmental reviews must also spell out proposed mitigation for each project so that the public understands what is being proposed to offset environmental impacts prior to the project being completed. The purpose of NEPA is to foster: informed government decisions; accountable and open government decisions; balanced government decisions; and ultimately better agency decisions. Described as the “look before you leap” law, this law has resulted in federal agencies making better decisions based on community concerns for over 30 years. An incomplete environmental review on a project because of incomplete research studies and mitigation plans does not enable government agencies to make balanced, informed, accountable and open decisions.
6. In all site-specific NEPA environmental reviews, standards should be established for consultation with local agencies and science-based conservation organizations. As an example, a sites-specific determination should examine the Important Bird Area program developed through BirdLife International, and administered by the National Audubon Society. Before wind development companies invest significantly in a specific site, they should understand which sites are included in IBAs. Entities like the Montana Natural Heritage Program, the Montana Dept. of Fish, Wildlife & Parks, and The Nature Conservancy should also be consulted.
7. In all site-specific NEPA environmental reviews, temporary and permanent new roads need to be documented. Roads cause significant impacts by fragmenting habitat, allowing more human access into sensitive areas, and acting as a conduit/infestation source for the spread of noxious weeds. Impacts from newly constructed roads proposed for projects need to be accurately quantified and described, including cumulative impacts from the network of roads on the environment.
8. Although requested by Region 6 of the U.S. Fish & Wildlife Service, we generally do not support the proposal to allow Service-held grassland and wetland easements to house wind farms. The only way these easements might be allowed to house a wind farm would be if site-specific analysis indicates that there will be almost no impact to wildlife benefiting from the easement. This site-specific analysis must include an assessment on whether or not the presence of turbines, as well as the operation and maintenance of turbines, could result in longer-term effects including avoidance and abandonment of habitats by wildlife, as well as habitat fragmentation on the landscape level. It is especially important to determine if displacement would likely result in reduced breeding success, productivity, and survival of wildlife. Additionally, site-specific assessments must anticipate how the transmission line structures associated with wind farms can be utilized as perches by raptors and other avian predators and what the resulting predation rates will be upon nesting birds and their offspring. In a state the size of Montana, surely there are other sites to develop for wind farms to be developed than Service-held grassland and wetland easements. This proposal should only be allowed if impacts on wildlife are close to nil.
9. The Programmatic EIS should require post-construction restoration work to use native plants. This is especially important for all restoration work for temporary impacts.
10. All site-specific assessments need to quantify impacts to wetlands and streams wherever impacts to these resources are anticipated. All quantified impacts to these resources need to be mitigated based on federal and state-based species of conservation concern being impacted.
11. All site-specific assessments need to assess the impacts to rare plant communities. Mitigation should be required for impacts to plants of conservation concern.

12. The Section 7 analysis needs to be done on a case-by-case basis, avoiding impacts to such species as Whooping Cranes and the Greater Sage-Grouse. Any “programmatic” Section 7 analysis that comes out of this Programmatic EIS needs to err on the side of rare species. For sage grouse, we recommend site-specific analysis that would: 1) identify all leks that will be impacted by a project; 2) evaluate the impact of the proposed project on winter survival needs; and 3) assess the impact of the wind farm and power line on movement of sage grouse needs to be more adequately assessed. Recent studies indicate that Sage Grouse avoid development areas of development, increasing mortality.
13. The Programmatic EIS should not undermine the ability of the Migratory Bird Treaty Act to be used when site-specific environmental reviews identify areas where impacts to birds that are considered threatened, endangered, candidate species, or species of conservation concern. In a large state like Montana, census work has large gaps.
14. Mitigation standards proposed in the PEIS should include mitigation measures to address bird and bat-related issues, including but not limited to:
  - Using wind turbines with no place for birds to perch or nest.
  - Placing all electrical lines between turbines underground and using unguyed meteorological towers to avoid places where birds can perch and/or collide.
  - Minimizing the length of:
    - Overhead transmission lines (these lines can impact birds by providing perches for them (attracting them to the site), which increases the likelihood of electrocutions and collisions with wires);
    - Roads that cause fragmentation of habitat.
  - Where overhead transmission lines are used, committing to using power pole and power line configurations that prevent raptor electrocutions or installing insulators (or other proven technology) on all power poles that are designed to prevent raptor electrocutions.
  - Using appropriate lighting that won’t attract night migrants (bats and birds), to the substation.
  - Using appropriate paint, tape, or other markings to ensure that night migrants can see hazards associated with wind farms.
  - Experimenting with ways to deter bats from approaching wind turbines too closely to avoid barotraumas. Once mitigation measures are established for this purpose, require wind turbines to use the technology in areas where 1) bats are documented to migrate, and 2) where bat species of conservation concern are located.
  - Requiring that adequate post-construction bird and bat surveys be completed; these results should then be compared to pre-construction/predicted bird and bat mortality rates. For this purpose, ‘adequate bird and bat surveys’ means that surveys:
    - Are conducted during the breeding season, as well as during the fall and spring migration season (many birds migrate along different routes during different seasons);
    - Are conducted during the above-described seasons for at least one year, but preferably for two years;
    - Examine day and night migration (bats and many songbirds migrate at night); and
    - Follow accepted peer-reviewed research protocol.
  - Requiring that a Technical Advisory Committee (TAC) be formed for the purpose of reviewing post-construction surveys and making recommendations if changes are needed. If post-construction surveys reveal significant impacts, the TAC should be invited to recommend management changes to the wind farm (e.g. the wind farm could be shut down during the height of migration (which is a matter of weeks in the course of a year)).
  - Establishing a step-by-step protocol for unforeseen bird and bat impacts.

- Where mortality to birds and impacts to habitat are expected to be significant, wind turbines should not be used. Newer technology with less likelihood of wildlife mortality such as vertical spiral vane generators must be considered as an acceptable alternative for generating wind power.

Please add us to the list of organizations contacted on the Draft Programmatic EIS. We would like to receive a copy of the Programmatic EIS so we can provide comments to that document.

Thank you for the opportunity to comment on scoping for this environmental review.

Sincerely,



Janet H. Ellis  
Program Director