

Thank you for your comment, Thomas Graves.

The comment tracking number that has been assigned to your comment is UGPW\_S50022.

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Upper Great Plains Wind PEIS

Comment ID: UGPW\_S50022

First Name: Thomas

Middle Initial: P

Last Name: Graves

Organization: Mid-West Electric Consumers Association

Address: 4350 Wadsworth Blvd

Address 2:

Address 3:

City: Wheat Ridge

State: CO

Zip: 80033

Country: USA

Email: meconsumers@qwest.net

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Attachment: CommentsFRN52855-52858.pdf

Comment Submitted:

[See Attachment.](#)



November 10, 2008

**Comments on Department of Energy/Department of the Interior  
Notice of Intent Programmatic Environmental Impact Statement on  
development of wind energy in the upper Great Plains as published in  
the Federal Register, September 11, 2008**

ORDEAN "LARS" NYGREN  
PRESIDENT

DENNIS ZIMMERMAN  
VICE-PRESIDENT

LYLE KORVER  
SECRETARY/TREASURER

THOMAS P. GRAVES  
EXECUTIVE DIRECTOR

The Mid-West Electric Consumers Association appreciates the opportunity to comment upon the Department of the Interior's intent to prepare Programmatic Environmental Impact Statement on development of wind energy in the upper Great Plains as published in the Federal Register, September 11, 2008.

The Mid-West Electric Consumers Association was founded in 1958 as the regional coalition of over 300 consumer-owned utilities (rural electric cooperatives, public power districts, and municipal electric utilities) that purchase hydropower generated at federal multi-purpose projects in the Missouri River basin under the Pick-Sloan Missouri Basin Program.

Mid-West understands the need for an environmental review of development of wind energy in the upper Great Plains. A Programmatic Environmental Impact Statement (PEIS) may not provide sufficient detail to be meaningful. Additionally, some of the work envisioned by the PEIS appears to have already been done. Finally, the PEIS does not directly address "affordability" issues associated with wind energy development.

As proposed, the Programmatic Environmental Impact statement goes far beyond an assessment of the impacts of wind-energy, calling for the development of a guide for development of wind-energy in the upper Great Plains. This approach is inappropriate, and goes well beyond the scope and jurisdiction of the Endangered Species Act.

As proposed, the PEIS covers a vast amount of territory and an enormous number of technical issues – environmental, legal, and electrical. As a result, it may provide a very general overview of issues without sufficient detail. The PEIS states that completion of the PEIS will permit a streamlined approach for compliance with NEPA, the National Historic Properties Act (NHPA) and the Endangered Species Act (ESA), but does not state what that "streamlined" approach will entail. Site specific studies will be necessary to ensure environmental compliance.

The PEIS proposes to define areas of high potential for wind energy development near the Western Area Power Administration's ("Western") transmission system. Western has already conducted many studies about wind energy development in the upper Great Plains. Since Western does not have transmission in Minnesota, why is it included in the study?

The second task of the study as described in the Federal Register announcement is to "[d]efine natural and human environmental resources in areas with high wind-energy development potential, including Native American lands, to support analyses of the environmental impacts and development of wind-energy resources." What does that mean?

The PEIS calls for development of mitigation practices in developing wind energy in the region, and monitoring of mitigation practices. Furthermore, it calls upon Western to "periodically" update its mitigation practices. It is certainly appropriate for Western to undertake mitigation measures when Western is the agency constructing a transmission line or on its "side" of a substation. It is not appropriate for Western to become a "police force" on mitigation practices of another entity's construction practices.

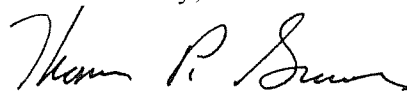
Task 6 calls for development of thresholds for "significant direct, indirect, and cumulative environmental impacts from wind-energy developments and association transmission system enhancements . . ." How are those thresholds to be determined? How is "significant" defined?

It is not clear why the PEIS would be defining possible transmission system enhancements to support wind development. Issues relating to transmission availability and enhancement needs are covered by Western's Open Access Transmission Service Tariff.

Nowhere in the PEIS is the issue of "affordability" addressed. Additions to Western's transmission system cost money and might be included in the rates charged to all transmission users. This issue must be addressed in the PEIS to fully measure the impacts of wind-energy development in the region.

Mid-West supports wind-energy development and sound environmental stewardship. The PEIS should concern itself with environmental stewardship. Wind-energy development is the responsibility of project developers proceeding through the Open Access Transmission Service Tariff and working with the Western Area Power Administration on site-specific transmission-related issues. The two issues (environmental impacts and development of wind-energy) should be kept separate.

Sincerely,



Thomas P. Graves  
Executive Director