From: Jeff Berglund <Jeff_Berglund@fws.gov>
To: Jeffrey_Towner@fws.gov
Cc: Brent_Esmoil@fws.gov; Kevin_Shelley@fws.gov; Mark_Wilson@fws.gov
Subject: Re: Fw: Upper Great Plains Wind PEIS Comments
Date: Thursday, October 25, 2012 9:29:04 AM

Hi all - MT FO comments are provided below. Thanks for the opportunity to review, and please call with any questions.

P ES-7, Line 28 and p ES-9, Line 8: It seems a requirement or recommendation should be added to both of these sections that addresses adherence to the FWS 2012 Land-based Wind Energy Guidelines relative to WAPA interconnect and Service easement exchange/encroachment proposals. The guidelines are later discussed under Ecological Resources; however, the document would benefit from more up-front discussion or mention of adherence to such 2012 Service guidance given that this is a wind energy-driven document for which the Service is a co-lead agency. (Also applies to Chap 2 - p 2-11 and 2-12).

P ES-37, Line 34: Elements of Alternative 3 specify no additional BMPs, mitigation measures, or monitoring would be requested by the Service, and that the Service would not require additional modifications to reduce environmental impacts relative to proposed projects necessitating easement exchanges. Considering recent publication of the 2012 Service Land-based Wind Energy Guidelines, to which the Service has agreed to adhere, is this truly a viable alternative? Given this conflict, why would this alternative not fall into the "considered but dismissed" category?

P 2-24 and 2-25, Table 2.3.2: "No effect" determinations for bull trout and pallid sturgeon don't seem entirely supported by the listed minimization/mitigation measures. For example, for projects that encompass drainages occupied by bull trout or pallid sturgeon, transmission line and road crossings of streams would potentially occur, although no mention of in-stream construction timing restrictions are included. We have not yet reviewed a BA; however, it does not appear at this stage that the "no effect" level has necessarily been (or would be) attained for these species. Note also that TES fish are indicated as "biota potentially affected" for all but one of the potential effects listed in Table 5.6-13 and for several of the effects listed in Table 5.6-14.

P 2-27, Table 2.3.2: Typo - remove "of" from "Do not use of guy wires for turbine or meteorological..."

Table 2.3.2: We recommend including reference citations that support the recommended buffer distances proposed relative to various species in the table (least tern, piping plover, greater sage-grouse, etc.).

Tables 2.3.2, 5.6-17, 5.6-18: Although occurring in the UGP Region, Montana candidate species whitebark pine, wolverine, and Arctic grayling (Upper Missouri DPS) were not included in the tables (we commented on this previously).

P 2-37, Line 26. We suggest adding a sentence indicating that the appendices to the Draft ECPG were finalized in August 2012.

P 2-38, Line 20. Per the 2012 Service WEG, the term "Avian and Bat Protection Plan" has been replaced with "Bird and Bat Conservation Strategy" in order to distinguish wind energy

projects from transmission projects. We suggest global replacement in the document as appropriate.

P 3-41, Liner 25: Suggest adding reference to Draft Eagle Conservation Plan Guidance in this section.

P 4-129, Line 33: Suggest adding reference in this section (and/or 4.6.4.2) to "species of concern", "species of habitat fragmentation concern", and "plant communities of concern" as defined in the Service 2012 Land-based Wind Energy Guidelines. It may also be useful to provide FWS state lists of species of habitat fragmentation concern to the extent that they have been developed (Montana has not yet generated such a list, but North Dakota [and possibly other states] has developed a list of these species).

P 4-130, Table 4.6-11 and subsequent discussion: Candidate species wolverine and Arctic grayling are still absent from this table and the subsequent discussion, and should be added (we commented on this previously).

P 5-68, Lines 17-37: Missing from this list is the physical location of turbines within a given project footprint (relative to topographic, aquatic, prey concentration, nest, or other features). We suggest this be added.

P 5-124, Line 48: In addition to referencing the APLIC anti-electrocution manual, this section should reference the APLIC anti-collision manual. According to a 10/12 APLIC committee presentation, the revised anti-collision manual will be published and available on the APLIC website in December 2012.

P 5-125, Line 3: States: "To the extent feasible, turbines and transmission lines should be located at least 2 mi (3.2 km) away from important bald eagle-use areas and at least 4 mi (6.4 km) away from important golden eagle-use areas; or, where home ranges are well mapped, outside the most used areas ("core" or "high-sensitivity areas" where eagles are likely to be within 50 percent of the time and "medium sensitivity areas" where they are likely to be 97 percent of the time) within the identified home ranges." Is the Service unintentionally setting new policy here with respect to specifying buffer distances? The DECPG refrains from recommending such specified buffers. Also, please see our previous comments on this section. Migratory Birds should provide input on this verbiage.

P5-144, Line 44: A third condition for project-specific consultation could apply here: Where an adverse affect is anticipated despite implementation of the programmatic avoidance measures, BMPs, or mitigation measures and additional measures and/or formal consultation are required. This also applies to P 2-18, Line 25.

Table F-?: In Montana, some federally ESA-listed species are also State-listed under the Montana Nongame and Endangered Species Conservation Act. Suggest including a reference to this or possibly a short table conveying this. See http://www.mtrules.org/gateway/RuleNo.asp?RN=12%2E5%2E201

Jeff

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Jeffrey Towner/R6/FWS/DOI10/15/2012 09:19 AM

To Mark Wilson/R6/FWS/DOI@FWS

cc Brent Esmoil/R6/FWS/DOI@FWS, Jeff Berglund/R6/FWS/DOI@FWS, Kevin Shelley/R6/FWS/DOI@FWS

Subject Re: Fw: Upper Great Plains Wind PEIS Comments

Thanks Mark, Brent, and Jeff; appreciate it.

Jeff Jeffrey K. Towner, Field SupervisorEcological ServicesU.S. Fish & Wildlife Service3425 Miriam AvenueBismarck ND 58501Telephone: 701-250-4481 ext. 508Fax: 701-355-8513"In the long history of humankind (and animal kind, too), those who learned to collaborate and improvise most effectively have prevailed." Charles Darwin

Mark Wilson/R6/FWS/DOI10/15/2012 07:53 AM

To Jeffrey Towner/R6/FWS/DOI@FWS

cc Jeff Berglund/R6/FWS/DOI@FWS, Brent Esmoil/R6/FWS/DOI@FWS

Subject Re: Fw: Upper Great Plains Wind PEIS Comments

Jeff: My staff has indicated that we should be able to provide comments on the Great Plains Wind PEIS by the end of the month.

Looking forward to seeing you in a couple of weeks in SLC.

Take care.

Mark

R. Mark Wilson, Field Supervisor

U.S. Fish and Wildlife Service

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"You will find as you grow older that courage is the rarest of all qualities to be found in public life." - B. Disraeli-

Former British Prime Minister

Jeff Berglund/R6/FWS/DOI10/15/2012 06:34 AM

To Mark Wilson/R6/FWS/DOI@FWS
cc brent_esmoil@fws.gov
Subject Re: Fw: Upper Great Plains Wind PEIS Comments

I think we can do that

Jeff Berglund

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Mark Wilson/R6/FWS/DOI10/13/2012 12:40 PM

To brent_esmoil@fws.gov
cc Jeff Berglund/R6/FWS/DOI@FWS
Subject Fw: Upper Great Plains Wind PEIS Comments

Brent/Jeff: Let me know if you think you can meet this deadline and I'll let Jeff Tower know.

'Thanks.

Mark

R. Mark Wilson, Field Supervisor

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"You will find as you grow older that courage is the rarest of all qualities to be found in public life." - B. Disraeli-

Former British Prime Minister----- Forwarded by Mark Wilson/R6/FWS/DOI on 10/13/2012 12:38 PM -----

Jeffrey Towner/R6/FWS/DOI10/12/2012 01:46 PM

To Mark Wilson/R6/FWS/DOI@FWS, Mike George/R6/FWS/DOI@FWS, Scott Larson/R6/FWS/DOI@FWS

cc

Subject Upper Great Plains Wind PEIS Comments

Gentlemen:

The reviewers of this PEIS agreed recently to provide comments to NDFO not later than Nov. 19. There is a desire in the RO to expedite this review, if possible. Do you think it would be possible for your offices to provide any comments you have by the end of this month? R3 has indicated they can furnish their comments in that timeframe, and our office will also be ready by then. Appreciate it.

Incidentally, quick reviews here and in the R3 RO have revealed several areas of significant concern with the document, so even if we can expedite our reviews, we will not necessarily be giving a recommendation to "clear" it to go to the public.

Jeff Jeffrey K. Towner, Field SupervisorEcological ServicesU.S. Fish & Wildlife Service3425 Miriam AvenueBismarck ND 58501Telephone: 701-250-4481 ext. 508Fax: 701-355-8513"In the long history of humankind (and animal kind, too), those who learned to collaborate and improvise most effectively have prevailed." Charles Darwin