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12/03/2012 04:14 PM

To: "Rick Amidon" <midwestwindhcp@fws.gov>
cc:
Subject: MSHCP comment

Please see attachment for my comments.

Kristi Rosenquist



612-961-5219 MSHCP Kristi's comments.doc

December 3, 2012

Regional Director
Attn: Rick Amidon
U.S. Fish and Wildlife Service, Region 3
Ecological Services
5600 American Blvd. West, Suite 990
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Sent via e-mail to: midwestwindhcp@fws.gov.

Draft Midwest Wind Energy Multi-Species Habitat Conservation Plan Within Eight-State Planning Area [FWS-R3-ES-2012-N179; FXES1112030000F2-123-FF03E00000]

Dear Mr. Amidon,

Thank you for the opportunity to comment on the USFWS proposal to create a Midwest Multispecies Habitat Conservation Plan (MSHCP) to facilitate issuance of Incidental Take Permits (ITP) for wind energy developers.

I have several concerns with the process for the creation and administration of this MSHCP as proposed.

1. I see no evidence of rigorous, comprehensive scientific research before, during, and after the installation of already existing and operating wind energy facilities. I have first-hand evidence of wind developers providing incomplete and purposefully misleading information to USFWS and the MN Department of Natural Resources apparently in order to site industrial wind development in areas of high risk to wildlife.
2. Where wind installations have already apparently violated federal law, I can find no evidence of enforcement actions by USFWS. If all guidelines are voluntary and there are no consequences for breaking existing laws, the wind industry has already demonstrated that they site turbines solely based upon profit and business convenience with no other considerations. This ensures illegal disturbance and slaughter of a wide range of species.
3. It appears the proposed MSHCP process and the primary decisions are being created and driven by the American Wind Energy Association. AWEA exists to promote the wind industry in the United States, to maximize profit for themselves and their members, and to mitigate financial risks to wind companies. AWEA appears to have an unhealthy insider access to the USFWS. AWEA stated in November 2, 2011, "Last fall, early draft version of Service's eagle conservation plan guidance was leaked. AWEA staff obtained advance copy." In past years, AWEA has objected to any move by USFWS that would slow or hinder the installation of industrial wind turbines at any location in the US. AWEA is a major participating planning partner driving this MSHCP. AWEA has already

demonstrated their disregard for wildlife, science based decision making, and their insider access to USFWS documents and decision makers which is unavailable to the general public. AWEA is listed as a primary participant in this MSHCP process. If USFWS wishes this MSHCP to be objective and science-based, then AWEA should have no more seat at the table than any member of the general public, and less than wildlife biologists knowledgeable of industrial wind development who do not have a conflict of interest as consultants and /or employees of the wind industry.

4. The Conservation Fund's only reference to wind energy that I have located on their website and through speaking with Kris Hoellen appears to have been written and dictated by AWEA. In addition, though Kris Hoellen claims the Conservation Fund has experience working with working farms on Conservation Planning, a review of their past projects shows very limited experience and only with multi-thousand acre ranches in Western states where acreage is being set aside from active production agriculture; or hobby farms in far Eastern United States being swallowed up by urban sprawl.

I see no evidence of The Conservation Fund having experience with Midwest production agricultural settings which are the primary locations for wind turbines in the Midwest eight state region. The Conservation Fund represented that the State conservation agencies will have the primary role in the MSHCP and that those state agencies have been, and will be driving the process. This was a surprise to the MN DNR and appears to be a misrepresentation of their understanding of the matter. They believe this is primarily a USFWS process. Also, the grant application itself with the identical form letters created by the Conservation Fund for signature by the states seems to demonstrate that states are NOT driving this process – just agreeing to be some part of it three years ago.

It is possible the Conservation Fund will perform excellent work. However, they have started the process with an appearance that they are either naïve about AWEA, or being driven by AWEA's desires. Either-way, the Conservation Fund does not appear to be a neutral fact finder or a neutral administrator of this important process.

5. The number of installed industrial wind turbines in the eight state region has nearly doubled in the three years since this grant application was made. States experiences over the past three years may have changed their understanding of industrial wind and, possibly their view of their role in this endeavor and possibly their desire to participate. The grant application stated that the work would already be completed by this point in time. USFWS may wish to reassess state agencies desire to participate and/or what role those agencies wish to play in this process. State conservation agencies are normally charged with management of State owned lands, not private property. Nearly all industrial wind turbines in these eight states are located on private property leased by wind developers. There is no basis to believe that state conservation agencies possess any detailed knowledge of wildlife on these privately held lands. Certainly they do not possess sufficient information to produce an MSHCP with any meaningful baseline data. This problem with wind turbine siting became clear in Minnesota starting in 2011.
6. USFWS has multiple overlapping processes occurring right now. The USFWS is starting the MSHCP without finalizing the eagle take guidelines. The comment period for this

process just closed in July 2012. USFWS ignored the primary feedback from non-wind interests by making the guidelines voluntary, and are now considering extending the ITPs from 5 to 30 years with no basis in science. These guidelines also appear to have been driven primarily by AWEA.

There is also a national HCP process occurring through US Geological Survey. Citizen and non-wind industry comments from ALL of these processes should be combined rather than forcing unpaid citizens and non-wind promoting non-profits and NGOs comment repeatedly on separate overlapping, related, but seemingly disconnected processes. Also, if the pre-determined end result is already dictated from the top powers in Washington D.C. to do whatever it takes to put wind development ahead of wildlife interests, then I recommend the USFWS not waste everyone's time with a charade of caring about public comment.

In conclusion, I found the following two statements on USFWS websites:

*"The mission of the U.S. Fish and Wildlife Service is working with others to **conserve, protect and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people.** We are both a leader and trusted partner in fish and wildlife conservation, known for our **scientific excellence.**"*

*"The U.S. Fish and Wildlife Service is leading development of a Habitat Conservation Plan for the Midwest that will conserve endangered species, **promote development of clean energy which in turn will reduce atmospheric carbon dioxide.**"*

There is no scientific study or evidence that industrial wind turbines are "clean"; that they displace or replace existing forms of electrical production nor that wind turbines ever will do so in any comprehensive and meaningful way; and, therefore there is no scientific or factual basis to form any connection between installing thousands of wind turbines and a reduction in atmospheric carbon dioxide. Since the USFWS states that their work is known for its scientific excellence, I recommend that USFWS remove these scientifically baseless statements about renewable energy written for the benefit of AWEA and their clients from your website.

Thank you.

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