

WYOMING GAME AND FISH DEPARTMENT



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WER 10988
Department of Energy
Golden Field Office
Draft Environmental Assessment
Proposed Clipper Windpower, Inc. Low Wind
Speed Turbine Demonstration Project
Carbon County

Steve Blazek
NEPA Compliance Officer
DOE Golden Field Office
1617 Cole Boulevard
Golden, CO 80401-3393

Dear Mr. Blazek:

The staff of the Wyoming Game and Fish Department has reviewed the Draft Environmental Assessment for the Proposed Clipper Windpower, Inc. Low Wind Speed Turbine Demonstration Project in Carbon County. We offer the following comments.

Terrestrial Considerations:

We provided comments on the scoping of this project in a letter dated November 10, 2004, and those concerns still exist.

The project occurs crucial winter/yearlong range for antelope, winter/yearlong range for mule deer, and a sage-grouse lek complex. Bald eagle, golden eagle, red-tailed hawk, ferruginous hawk, Swainson hawk, prairie falcon, kestrel and great-horned owl are known to nest in the surrounding area and northern harrier and burrowing owl occur in the project vicinity. Several migratory birds that can be found in this area include mountain plover, sandhill crane, Canada geese, and a variety of other waterfowl, shorebirds and wading birds. Historically, black-footed ferrets were sighted in the general vicinity. A variety of bats occur in the area.

Major unresolved issues raised during scoping include the justification for siting the demonstration project at this site, the lack of detail in comparing how the Clipper low speed turbine differs from existing turbines that have been evaluated for environmental consequences,

the lack of adequate baseline, construction and post-construction monitoring, and the minimal commitment to avoid impacts or implement mitigation.

The EA does not fully address the cumulative impacts (Section 4.9, pp 75ff), particularly the existing and proposed wind plants in the vicinity, and fails to disclose the potential for windpower expansion at the proposed site. Figure 4.1 and the related discussion are incomplete and do not show many of the projects.

A considerable amount of wildlife information has been gathered in the vicinity and at nearby windplants over the years. We suggested that these be specifically reviewed and referenced in the EA. If the EA is going to base assumptions on other studies (e.g., SeaWest), then it needs to present the similarities and differences between sites and projects. A single, non-quantified reconnaissance survey is inadequate as a baseline for the project (e.g., p. 41).

Measures to reduce impacts incorporated into the project are vague and appear to be solely at the discretion of the operator, despite federal funding and involvement. For example, we recommended during scoping that construction not occur from November 15- April 30, to prevent disturbance on crucial big game range. However, construction would start in December of 2004 and continue for about 2 months during this sensitive period (pp. 15, 21, 60-62).

Measures to mitigate sage-grouse concerns are inadequate (p. 21). The immediate construction of the project does not allow for any baseline data gathering and may discourage sage-grouse from even initiating strutting in the event these birds decide to reoccupy close lek sites. NREL or Clipper WindPower should commit to this monitoring. If leks are active, additional mitigation would be required.

The provision for only monitoring mortality for only 1 year (p. 21) is grossly inadequate and does not negate the project from obligations under the Migratory Bird Treaty Act and other laws. One year's monitoring may mask actual impacts due to seasonal and annual variation. DOE should require monitoring for at least 3 years. Results should be compared to other nearby projects. Mortality monitoring does not address scavenging and decomposition (pp. 64-65).

We suggest that the design and characteristics of the proposed low-speed wind turbine be contrasted with other existing designs, including height of rotor-swept area, blade tip speeds, and potential for wildlife mortalities. Implications of the differing height of the rotor-swept area from the Clipper design to conventional turbines should be discussed in detail (p. 64).

Individual met towers can cause as much wildlife mortality as working turbines, especially if these are lattice towers with guy wires. We recommend using current met towers by the Platte River Power Authority and others since they are already monitoring wind speeds in the area.

The assumptions about impacts to Bald Eagles (p. 35, p. 54) are understated. An active Bald Eagle nest is within 8 miles of the preferred site and is directly in the flight line to East Allen Lake, where waterfowl, fish and other preferred prey occur.

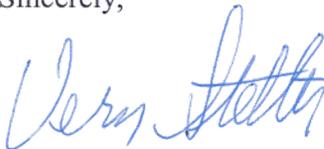
In summary, we are disappointed that the Draft EA did not take our scoping comments more seriously. The document fails to recognize the potential implications of this different type of wind turbine.

Aquatic Consideration:

We continue to have no aquatic concerns pertaining to this project.

We thank DOE for the opportunity to provide comments. We ask that DOE provide a more comprehensive final EA and assure adequate monitoring and mitigation.

Sincerely,


fm BILL WICHERS
DEPUTY DIRECTOR

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cc: Mary Flanderka-Governor's Planning Office
USFWS