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WYOMING OUTDOOR COUNCIL •**

December 10, 2004

Sent via first-class mail, postage pre-paid.

BLM Wind Energy Programmatic EIS
Argonne National Laboratory, EAD/900
97900 S. Cass Avenue
Argonne, IL 60439

Re: Wind Energy Development Draft Programmatic EIS
PUBLIC COMMENTS

Dear Reviewers:

Thank you for this opportunity to comment on the Wind Energy Development Draft Programmatic EIS (“Wind DPEIS”). The undersigned commentors are actively involved in energy issues currently facing the Interior West, and they remain vitally interested in the government’s commitment to developing wind energy resources on lands administered by the Bureau of Land Management (BLM).

We applaud the BLM’s interest in developing and initiative in examining renewable sources of energy. The dual purposes of the DPEIS are to assess the environmental, social, and economic impacts of wind energy development in the western states, and to evaluate alternatives to determine best management approach for mitigating impacts and facilitating wind energy development. DEIS at 1-1. We feel that this EIS is a strong first step toward developing renewable energy sources on our federal lands. We also feel that it is important that “green power” such as wind energy development also be green on the ground, as bad planning or inappropriate siting will set the cause back for this renewable resource by eroding public support for wind. Smart decision-making and project siting – including protection of habitat and special places – is in everybody’s best interests.

In developing the FEIS and implementing its recommendations, we urge the BLM to work closely with the visionary Governors who are positioning the Interior West to move beyond the fossil fuel economy and its associated boom and bust cycles, by calling for a speedier transition to a sustainable energy economy. These local leaders, such as New Mexico Governor Bill Richardson, are deeply and genuinely committed to establishing an energy economy that will serve the region long after fossil fuels supplies are exhausted. The Western Governors’ Association recently approved a resolution calling for 30,000 megawatts of clean energy and

renewable power production to be built in the region by 2015, and calling for increasing energy efficiency in the region 20% by 2020. Several of these Governors are, at the same time, raising questions about the impacts of gas drilling on wilderness-quality landscapes, wildlife, water, and other vital resources. These actions by western governors show a commitment to developing clean energy resources in the West, and they demonstrate that the political will exists to capitalize on the West's wind resources. Simply put, these elected officials present a significant opportunity to move forward the proposals contained in this EIS and need to be listened to.

As we said in scoping comments, the BLM should bear in mind the importance of continued popular support for wind energy development. At least as much as the economic and technology issues, the future of wind energy development depends on its continued perception as an environmentally-friendly and renewable power source with minimal environmental impacts. Accordingly, BLM must ensure that wind projects are carefully designed and sited to reduce and mitigate impacts, by assuring full public participation throughout the planning process. A poorly sited or designed project with highly-publicized negative impacts could unnecessarily set back the cause of renewable energy generation from public lands. Therefore, we encourage BLM to err on the side of caution with regard to the siting, design, and public involvement with respect to wind energy development projects.

While we applaud the BLM's efforts with regard to regional planning of wind energy development, we also encourage the BLM to undertake a similarly comprehensive regional EIS that looks at oil, natural gas, and coal exploration and development on federal lands of the Interior West. The impacts from fossil fuel development and power plants are generally greater than those associated with wind, making a compelling case for a broader Programmatic EIS. The emphasis in the National Energy Policy on natural gas production in the Rockies region establishes an urgent need for such a region-wide programmatic look that analyzes the various combinations of energy sources to determine which makes the most sense – economically, socially, and ecologically – for the West and the nation.

The Final Programmatic EIS Must Ensure that Existing Legal Requirements and Planning Processes are neither Undermined nor Ignored.

The Interior West possesses an abundance of wind energy potential that can make a significant contribution to the region's electric resource mix. Good wind areas, found on approximately 6% of the land in eleven Western states, could supply more than five times the region's current electricity consumption.¹ Wind resources are a clean energy source and provide an excellent opportunity for the West to reduce its reliance on environmentally-harmful fossil fuels such as coal and natural gas. Wind energy affords the benefit of a cleaner environment because, as opposed to fossil fuel combustion, wind generation and transmission produces no air emissions that endanger public health, results in no greenhouse gas emissions which contribute to global warming, and requires very limited water use. If developed and sited properly, wind energy has fewer and less significant impacts to land, air, and water than fossil fuel extraction and combustion. Wind energy offers the opportunity to shift the balance of energy development on public lands from high-impact fossil fuel technologies that create boom-bust economic cycles

¹ See *Renewable Energy Atlas of the West*, available at www.energyatlas.org, at 8.

to lower-impact, sustainable technologies that make lasting economic contributions to local communities.

That said, wind energy projects should be treated the same as any other proposed use of federal lands, subject to thorough, site-specific analysis and public participation. All laws and regulations applicable to other projects on the federal lands must be complied with, including the National Environmental Policy Act, the Federal Land Policy and Management Act, the Endangered Species Act, the Migratory Bird Treaty Act, and other federal laws. Importantly, the BLM may not use this Programmatic EIS to avoid the duties of site-specific analysis that attach to individual wind energy development projects, such as the requirements to consider a reasonable range of alternatives, to analyze the direct, indirect, and cumulative impacts of each of these alternatives, and to solicit and respond meaningfully to public input. Moreover, whether the BLM is considering wind, oil and gas, coal, or other energy development, the agency is required to heed the letter and spirit of the provisions in FLPMA that provide for the “multiple-use and sustained yield” and the avoidance of “unnecessary and undue degradation” of public lands, which means that the level of energy development – even wind energy development – must be compatible with other uses of the federal lands and cannot result in marked degradation of healthy functioning ecosystems.

a. The Final EIS Should Ensure that Project-Level NEPA Analyses Are Sufficiently Thorough and Site-Specific.

The DEIS provides that the level of environmental assessment that will be required for individual wind power projects will be determined at the Field Office level, may be limited to an environmental assessment (EA) and may tier off of the Programmatic EIS for potential environmental impacts. DEIS at 2-7. This direction, however, is inconsistent with NEPA’s requirement for BLM to consider the direct, indirect, and cumulative impacts of a project. 40 C.F.R. §1508.8. To the extent the BLM purports to authorize tiering to this Programmatic EIS for “issues and concerns” associated with specific wind energy development proposals, see DEIS at 2-7, such tiering is proper only where the analysis of impacts in this EIS is sufficiently site-specific and detailed. This broad, regional programmatic impact statement cannot substitute for the detailed analysis of direct, indirect, and cumulative impacts required under NEPA.

The assessment of environmental impacts set out in Section 6 of the DEIS is necessarily general due to the regional nature of this analysis, identifying the typical impacts of a wind energy development project (as described in Section 3) on various resource values. However, the 11-state study area included in the PEIS is widely diverse in terms of topography, wildlife and plant species, climate and amount of existing development. All potential sites will be characterized by unique resources, uses, impacts and public concerns. As a result, the impacts analysis in the Programmatic EIS will likely be insufficient to satisfy NEPA’s directive to consider the impacts of a particular proposal. A substantial site-specific analysis of the impacts resulting from a particular wind development proposal should be conducted pursuant to NEPA.

In Section 2.2.3 and Section 6.1.2, BLM commits to requiring incorporation of best management practices (BMPs) into Plans of Development and Right-of-Way (ROW) grants as stipulations. Additional mitigation measures will be applied, also as stipulations, “to address

site-specific and species-specific issues.” PEIS, p. 2-6. We support BLM’s commitment to incorporating both the standard BMPs set out in Section 2.2.3.2 and site-specific measures as stipulations in the Plan of Development and/or ROW grant, such as those discussed in Section 5 of the PEIS.

In order for BLM to rely on mitigation of environmental impacts when considering a specific proposal, NEPA requires that BLM make a firm commitment to the mitigation measures, discuss the mitigation measures in sufficient detail to ensure that environmental consequences have been fairly evaluated, and fully assess their effectiveness at the proposed project location. Thus the effectiveness of the BMPs and mitigation measures set out in this Programmatic EIS will depend on the context of the project location. For example, the likelihood of successful restoration of vegetation will be significantly reduced in dry areas populated by desert grasslands, which are sensitive to disturbance and have shallow topsoil. The BMPs and mitigation measures identified in this Programmatic EIS are an important first step toward minimizing adverse environmental impacts from wind energy projects, and they will be helpful in providing general guidance to land managers. Nonetheless, the FEIS should clarify that in the context of a specific wind energy development proposal, mitigation measures incorporated as stipulations must be carefully tailored to site-specific conditions and rigorously analyzed as to the likelihood that they will reduce environmental impacts in the context of the wildlife, vegetation, land type and other site-specific characteristics.

We also recommend that the FEIS advise land managers that an EIS may well be required for analyzing the impacts of individual wind energy development projects. Any commercially viable wind energy project is virtually certain to have the potential for significant environmental impacts, because the long-term nature the project and the substantial potential adverse impacts to wildlife, habitat, vegetation, open landscapes and other uses and users of the public lands. Commercial wind farms will have a large footprint and require a substantial support infrastructure. In light of the long-term presence of a wind energy project, public participation in reviewing and commenting on BLM’s analysis and decisions is especially important. In the rare situation where BLM determines that an EIS may not be required, BLM should mandate that EAs for wind energy development projects be subject to meaningful public review and comment. NEPA requires that the public have an opportunity to review and comment on an EA where the EA is addressing a new or unusual resource use or may be subject to scientific or public controversy. 40 C.F.R. § 1501.4(2); *see also* CEQ’s *Forty Most Asked Questions*, 46 Fed. Reg. at 18037. Wind energy is a new use that meets this standard. Because of the potential harm to avian and bat species alone, in no case will the siting of even a single turbine be appropriate for consideration as a categorical exclusion.

b. The Final EIS Should Ensure that Land Use Plan Amendments to Accommodate Wind Energy Projects Include Public Participation and Consideration of Environmental Impacts.

In the DEIS, the BLM commits to amending certain land use plans (LUPs) to adopt provisions of the Wind Energy Development Program and to identify land available or unavailable for wind energy development. DEIS at 2-7. BLM also states that an EA may be sufficient for approval of a wind power project.

We commend BLM's acknowledgement that amendment of existing LUPs will be necessary where developable wind resources are potentially located. See DEIS Appendix C. Such an LUP amendment is required for a change in resource uses and change of decisions from the current plan, such as permitting wind energy development. See 43 C.F.R. §1610.0-5(b), §1610.5-5; BLM *Land Use Planning Handbook*, H-1601-1, Section VII.B. These proposed amendments include adoption of the proposed programmatic policies and BMPs and identification of specific areas where wind energy development would not be allowed. It is important that such LUP amendments be subject to thorough public review and comment, as they represent a change from historic land management direction and could serve to allow the long-term presence of wind energy projects.

The BLM should also direct in the FEIS that, where a land use plan will be amended to accommodate a wind energy development proposal, not only will the standard BMPs from this Programmatic EIS apply but also specific additional mitigation measures must be evaluated for Plans of Development and ROW grant stipulations for the area. Further, as discussed above, in the context of a plan amendment, the analysis of environmental consequences of wind energy development should not simply tier off the discussion of BMPs or the mitigation measures contained in the Programmatic EIS. Rather, the Programmatic FEIS should clarify that the potential mitigation associated with various stipulations that might be mandated in a LUP amendment must be fully analyzed in the context of the area-specific landscape and other conditions in which the mitigation measures will actually be applied.

The Final Programmatic EIS Must Ensure Proper Siting of Wind Energy Projects.

Wind energy projects, as with all other types of development, are not appropriate for all public lands. As the BLM acknowledges, some federal land areas must be off-limits to wind energy projects. The DEIS provides that BLM will not permit wind energy development where it is "incompatible with specific resource values." DEIS at 2.6. We agree with and support BLM's recognition that wind energy development and its associated infrastructure is incompatible with and should be excluded from the specially-designated areas identified, including National Landscape Conservation System areas (National Monuments, National Conservation Areas, Wilderness Areas, and Wilderness Study Areas) as well as Areas of Critical Environmental Concern. We propose that BLM add to this list Native American sacred sites, citizen-proposed wilderness areas, areas of critical habitat, and habitats important for imperiled species. Finally, we urge BLM also to recognize that wind energy development and its associated infrastructure is incompatible with and should be excluded from areas that are designated or proposed for management to protect wilderness characteristics, and to recognize the impacts of wind energy development and its infrastructure to such areas as part of any analysis of environmental consequences.

The April 2003 "no more wilderness" settlement does not affect BLM's obligation to value wilderness character or its ability to protect it, including in management designations which would also merit exclusion of wind energy development. BLM has not only claimed that it can continue to protect wilderness values, but has also committed to doing so. The Instruction Memoranda (IMs) 2003-274 and 2003-275, which formalize BLM's policies concerning

wilderness study and consideration of wilderness characteristics in the wake of the settlement, contemplate that BLM can continue to inventory for and protect land “with wilderness characteristics,” such as naturalness or the ability to provide opportunities for solitude or primitive recreation, through the planning process. The IMs further provide for management that emphasizes “the protection of some or all of the wilderness characteristics as a priority,” even if this means prioritizing wilderness over other multiple uses.² As applied to this EIS, BLM’s policies for wind energy development should also require a specific assessment of the potential impacts of wind energy development to lands with wilderness characteristics, whether or not these lands are already designated for management to protect wilderness characteristics or have been identified by the agency or the public for consideration for further protection.

A thorough analysis of a reasonable range of alternatives will be absolutely essential to the proper siting of wind projects. We can envision scenarios where factors such as avian migration corridors, Native American sacred sites, or important wildlife habitat would counsel against selection of the exact site initially proposed by the project proponent, but there might be lands in the vicinity with equal potential for wind production that would avoid the unacceptable impacts of the proposed site. In such scenarios, comprehensive analysis of multiple siting alternatives would allow the project to proceed without causing undue harm, whereas narrowly construing the range of alternatives would result in poor decision making. NEPA’s requirement that agencies study a reasonable range of alternatives was designed to resolve controversy and to balance competing public needs. We recommend that the FEIS advise land managers of the importance of thoroughly evaluating a reasonable range of alternatives when presented with a proposal for a particular wind energy development project.

Moreover, meaningful involvement by state, tribal, and local governments, other agencies, and the public will generally require at least a 90-day comment period for a commercial wind farm. This is a relatively short period when compared to proposed projects with a duration of several decades. The benefits of comprehensive analysis and public review will pay off in future dividends: good siting and design decisions will minimize controversy and attendant delays and will ultimately result in successful and commercially-viable projects that enjoy strong public support. We recommend that the FEIS advise land managers to provide for 90-day comment periods for consideration of commercial wind farms.

With respect to visually sensitive areas, VRM Class I and II objectives are, respectively, to “preserve” or “retain” the existing character of the landscape. Siting decisions for wind energy projects can be modeled on provisions of the Surface Mining Control and Reclamation Act “designating areas unsuitable for surface coal mining.” See 30 U.S.C. §1272.³ Federal wind

² The BLM Arizona State Office has formalized this guidance by providing for a land use allocation called “Management for Wilderness Characteristics.” See AZ- IM-2004-021. Similarly, the recently-released Draft RMP/EIS for the Roan Plateau (prepared by BLM’s Glenwood Springs Field Office in Colorado) includes managing certain areas to protect wilderness characteristics as a priority over other uses. See, 69 Fed.Reg. 68970. Further, in the Draft RMP/EIS for the Price Resource Area in Utah, the BLM included lands outside Wilderness Study Areas that have or are likely to have wilderness characteristics in the analysis of potential impacts. See, e.g., pp. 4-21 – 4-22, 4-480 – 4-484.

³ The National Academy of Sciences recommended policies to maintain healthy ecosystems and protect wilderness quality lands from oil and gas leasing and development in *Land Use Planning and Oil and Gas Leasing on Onshore Federal Lands* (1989). Specifically, the NAS study (at 115) recommended that, prior to leasing, other

projects should also ensure compliance with local zoning laws and land-use regulations. Moreover, siting should avoid incompatible land uses. Wind farms are most appropriately located where there are existing compatible land uses, such as agriculture. Initial site evaluation will be an important aspect of the planning process. Western Resource Advocates has published the *Renewable Energy Atlas of the West: A Guide to the Region's Resource Potential* (2002, www.energyatlas.org) that provides baseline data and maps showing the potential for wind and other renewable energy sources in the West.

New road construction is also a concern with respect to new wind energy projects, including both wind farms and associated transmission capacity. New road construction and major improvements (such as paving and widening two-track dirt routes) should be minimized and existing routes relied on where possible. Best management practices on everything from road location to grading and maintenance should be required to minimize erosion, sedimentation of surface waters, forage losses, invasive species and habitat disruption. The measures in the DEIS for “traffic management plans” and road construction are a good start, see DEIS at 2-13 and 2-18, although more specific measures should be included in the FEIS to ensure that new roads are in fact minimized and, where they are necessary, are built in the most environmentally-protective manner possible. For example, the admonition in the DEIS to use existing roads “to the extent possible,” see DEIS at 2-18, is not particularly helpful in guiding future transportation decisions. The BLM’s “Gold Book” of Surface Operating Standards for Oil and Gas Exploration and Development might provide helpful guidance for the proper siting and construction of roads associated with wind energy development.⁴

Transmission issues are another important aspect of wind energy development. Projects should be sited to take advantage of existing transmission capacity, minimize power loss during transmission, and minimize the construction of new transmission infrastructure. The *Renewable Energy Atlas of the West* is a useful resource for transmission planning in the Interior West, as it inventories resources in reference to existing infrastructure, such as transmission lines and substations.

We encourage the BLM to include in the Final Programmatic EIS clear and enforceable standards to guide future siting decisions that make clear that wind energy projects are inappropriate and should not be authorized in the areas set forth above. We urge BLM to include in the Final EIS enforceable standards for visually sensitive areas in order to “preserve” or “retain” the existing character of the landscape. We urge BLM to adopt standards applicable to road construction, including best management practices for road location, grading, and maintenance. Finally, we urge BLM to include standards that will guide the use of existing transmission capacity and minimize the construction of new transmission infrastructure.

resources should be analyzed to determine whether oil and gas development can be regulated to control its impacts on other values to acceptable levels, with such stipulations as the planning process indicates are required to protect those other values. We urge BLM to adopt these recommendations for its fluid minerals program.

⁴ See www.mt.blm.gov/oilgas/operations/goldbook/GoldBook.pdf at 12-20.

The Final Programmatic EIS Must Consider Specific Resources and Impacts.

Specific resources and impacts that should be considered for individual wind power projects include:

1. The FEIS should provide for the thorough consideration of wildlife and wildlife habitat, with special attention to any threatened, endangered or other special-status species and essential wildlife migration corridors. The FEIS should also provide adequate buffers for certain habitat such as nest and lek locations. Moreover, the FEIS should accord full protection to vital winter range which is shrinking across the West.
2. The FEIS should ensure the thorough consideration of plants and plant habitat where wind energy development projects are to be considered, with special attention to any threatened, endangered or other special status species as required by law.
3. The FEIS should provide for the thorough evaluation of impacts to avian species -- especially migratory birds, raptors and bats -- and important flyways and raptor concentration areas. The FEIS should ensure that project siting and design minimize bird and bat mortality. The FEIS should include standards that ensure that projects are sited to avoid key migration routes of both birds and bats. The FEIS should also ensure through adoption of a BMP that the siting and design of turbines, supports, and associated powerlines avoid creating perching opportunities for birds. Raptors, for example, use human-made perches to prey on prairie-nesting species such as the prairie chicken, a species that has seen adverse impacts from such towers in recent years. In this regard, columns are generally better than lattice towers, and power lines should be buried to avoid both perching and electrocution. See DEIS at 2-18. Also, the FEIS should include standards to ensure that turbines are not placed on escarpment edges, as well as standards to ensure that the sweep point of the blades of any wind development project is higher than the apex of nuptial flights for birds in the area. Finally, we urge the BLM to carefully consider the potential impacts to birds and bats and the mitigation measures suggested in research conducted by Western EcoSystems Technology, Inc. See www.west-inc.com/wind_reports.php.
4. The FEIS should provide for the thorough consideration of the visual environment, including scenic view-sheds, and establish specific standards to guide siting with respect to viewsheds. The BMPs with regard to Visual Resources in the DEIS should be retained or strengthened. See DEIS at 2-12.
5. The FEIS should ensure that the agency's consideration of wind energy development projects complies with the National Historic Preservation Act (NHPA), including its requirements that all tribes and tribal organizations that may have an interest in the area are consulted and a cultural resources management plan is developed where necessary. The FEIS should ensure that the requirement that the agency protect culturally important sites and archeology is made clear. One way of doing so would be for the FEIS to make clear that the consideration of a proposed wind energy

project is an “undertaking” within the meaning of the NHPA. See 16 U.S.C. §470f. The DEIS’s discussion of Cultural Resources in Chapter 4 and the BMPs for consultation and cultural resource protection should be retained or strengthened. See DEIS at 4-50 and 2-14, respectively.

6. To avoid creating an aural nuisance, the FEIS should limit decibel levels to acceptable standards, and it should establish an acceptable distance for the siting of wind energy projects from the nearest residences or recreational use areas. The direction in the DEIS that stationary construction equipment such as compressors and generators “should be located as far as practicable from nearby residences,” see DEIS at 2-20, is insufficient to guide future siting decisions. The FEIS should establish minimum setbacks, along with specific standards to describe instances when the setbacks may be found to be inappropriate.
7. In our scoping comments, we requested that the DEIS thoroughly consider electro-magnetic interference. The DEIS mentions the conflicting science as to the adverse health effects of exposure to electro-magnetic fields, and then simply states that more research is needed. DEIS at 3-18. The DEIS’s statement that definitive data is not available does not appear to satisfy the BLM’s duties of disclosure. See 40 C.F.R. 1502.22 (imposing procedural duties with respect to incomplete information).
8. The FEIS should direct land managers making wind energy project siting decisions to thoroughly consider the proximity of potential wind energy projects to areas such as and National Parks and Wilderness Areas. BLM officials should carefully weigh public comments on wind energy projects near these specially-designated areas and consult with agency officials responsible for the management and protection of National Parks and Wilderness Areas.

The Final EIS Should Discuss Energy Self-Sufficiency, Ensure Adequate Comprehensive Monitoring, and Evaluate the Economic and Ecological Tradeoffs Resulting From Wind Energy Development

The FEIS should provide that the agency will evaluate and consider wind energy projects with an eye toward maximizing power production from the resource and minimizing the environmental impacts of its development. In doing so, the FEIS should evaluate the role of wind power generally in achieving a greater measure of energy self-sufficiency in the Interior west and in reducing our reliance on imported fuels. Moreover, the FEIS should provide that once built, wind energy development projects will be rigorously monitored and evaluated in order to minimize that projects’ impacts as well as to improve the siting and design of future projects. We support adequate funding for monitoring, maintenance, evaluation, and conduct of scientific studies relating to wind energy development projects.

The FEIS should also include a comparative analysis of the costs and impacts associated with wind versus the region’s increased reliance on coal. Wind energy development does not occur in a vacuum, and in light of the fact that several new coal-fired power plants have been proposed across the West, the BLM should look at the comparative regional costs and benefits of

developing these two resources. Wind energy is a free, renewable resource and a source of clean, non-polluting electricity. The FEIS should include and thoroughly discuss comparative data on wind energy's tradeoffs, including its offset of fossil fuel consumption, the land and water impacts of fossil fuel development, the emissions from conventional power plants, and greenhouse gases associated with fossil fuels. Accordingly, the FEIS should thoroughly discuss and evaluate the energy conservation and greenhouse gas potential of each alternative discussed, as required by the Council on Environmental Quality regulations implementing NEPA. See 40 C.F.R. §1502.16(e), (f).

The BLM Should Prepare a Similar Regional Programmatic EIS Examining Region-Wide Natural Gas Development

The BLM's preparation of the Programmatic EIS analyzing wind energy development on a region-wide basis calls into question the BLM's failure, to date, to prepare a regional Natural Gas Programmatic EIS on the impacts of implementing the National Energy Policy on federal lands in the Rocky Mountain states of the Interior West (Montana, Wyoming, Colorado, Utah, and North Dakota). Most of the reasons that a Programmatic EIS to discuss and evaluate wind energy development is a good idea apply with equal or greater force to the need for a Natural Gas Programmatic EIS.

For example, the National Energy Policy targeted selected BLM Resource Management Plans across the region as "Time-Sensitive Plans" requiring urgent revision to facilitate stepped-up exploration and development of natural gas. Ever since the BLM began implementing the National Energy Policy in the Rockies, leasing, seismic exploration, and drilling projects have surged. BLM, however, has neglected to study the cumulative impacts of this new natural gas activity across the region.⁵ Even within mineral basins, BLM has violated NEPA by arbitrary bifurcating its planning efforts according to state lines or administrative boundaries – for example within the San Juan and Power River basins, or in the Red Desert/Great Divide region. In light of the fact that Western watersheds, airsheds, and migration corridors do not follow the same administrative boundaries as BLM Resource Areas, the BLM has not adequately collected or studied the cumulative impacts of its new natural gas policies and the new natural gas policies on a regional or even sub-regional basis. Conservationists have articulated comprehensive, regional visions for the ecologically-linked lands in the Interior West, and we encourage the BLM to do the same.⁶

BLM and other federal agencies have taken concrete steps to facilitate natural gas development in the Rockies, such as preparing time-sensitive plans, promulgating new policies, directives, and Instruction Manuals, and forming the inter-agency Rocky Mountain Energy Council. The public, however, was not allowed to participate in the formation of the National Energy Policy and it was never made subject to public review or comment. In fact, the

⁵ See *Drilling in the Rocky Mountains: How Much and at What Cost?*, The Wilderness Society, presented at 2004 North American Wildlife and Natural Resources Conference.

⁶ See *Southern Rockies Wildlands Network VISION: A Science-Based Approach to Rewilding the Southern Rockies*, a publication of the Southern Rockies Ecosystem Project, Denver Zoo, and Wildlands Project (July 2003). See also *Heart of the West Conservation Plan*, a spatial analysis by the Wild Utah Project of the relative importance of various wildlife habitat cores and linkages throughout the Wyoming Basins Ecoregion (Spring, 2004).

administration has continued to stonewall in the face of public efforts to obtain the release of government documents associated with the development of the National Energy Policy. Should the BLM act proactively to programmatically address the regional impacts and alternative strategies to meet the projected increases in energy demand, it could reduce public controversy and assist with analysis when approving specific projects.

Thank you for this opportunity to comment on the Draft Programmatic EIS for wind energy development. We look forward to continued participation in this process. Should you have any questions or concerns, please do not hesitate to contact us at the address below.

Sincerely,

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P.S.

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I will furnish contact information for other signatories who wish to be on the contact list to receive information, updates, and documents as this Programmatic EIS proceeds.