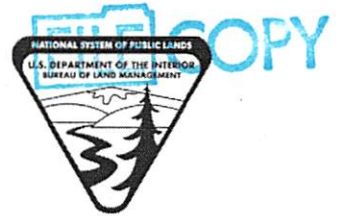




United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Billings Field Office
5001 Southgate Drive
Billings, Montana 59101-4669
www.blm.gov/mt

In Reply Refer To:

1780 (MT010.CD)

SEPTEMBER 16 , 2014

Carbon County Planning Office
County Administration Building
17 West 11th Street
Red Lodge, MT 59068

To Whom It May Concern:

The Bureau of Land Management (BLM), Billings Field Office, has received your request for comments regarding a wind power development permit application adjacent to public lands within the southeastern portion of Carbon County. The following are our comments concerning resources in this area.

The BLM will only comment on actions affecting public lands. From the scale of the map provided it is difficult to discern whether any public lands are currently included; however, numerous parcels of public land are immediately adjacent to the proposed project area and resources therein may be affected. Additionally, future development associated with this project may require the use of public lands for access and/or transmission.

The proposed wind power development map provided is almost entirely within, or adjacent to, Priority Protection Area (PPA) for sage-grouse habitat (as designated by the BLM) or a Core greater sage-grouse habitat area (as designated by the Montana Department of Fish Wildlife and Parks). There are 6 greater sage-grouse leks (breeding display grounds) located within 4 miles of the proposed wind turbine towers. Furthermore, recent telemetry research tracking radio-collared greater sage-grouse has indicated this area is used as yearlong habitat by sage-grouse.

The BLM has issued interim sage-grouse management guidance in the form of Instruction Memorandum 2012-043 titled "Greater Sage-Grouse Interim Management Policies and Procedures." The management prescriptions provided in IM 2012-043 will be followed on public lands until the Draft Billings Field Office Resource Management Plan and Environmental Impact Statement is completed. Several management criteria are described in this guidance along with the following statement. "Field offices retain the discretion to reject or deny a ROW application, where appropriate, or defer making a final decision on an application until the completion of the RMP process described in the *National Greater Sage-Grouse Planning Strategy* for the affected area." Wind energy development may affect greater sage-grouse as described in the following paragraphs.

Braun et al. (2002) reported that sage-grouse were particularly susceptible to the placement of overhead power lines within 0.8 km (0.5 mi) of nesting grounds. Significant impacts to sage-grouse have been documented from overhead power transmission and communication distribution lines out to 6 km (3.7 mi) (Manville 2004). Collisions with power lines and vehicles and increased predation by raptors may increase mortality of birds at leks (Connelly et al. 2000). Further, sage-grouse mortality associated with roads and power lines can occur year-round (Walker et al. 2007). Thus, roads and power lines may also alter the productivity or survival of sage-grouse outside the reproductive season; thereby indirectly reducing the number of birds that use leks, increasing lek abandonment (Naugle et al., in press).

Both wind farms and oil and gas fields consist of large aggregations of infrastructure and activities that share some common features, such as transmission lines and roads, and differ in others, such as wind turbines. Impacts to sage-grouse from wind energy development would likely be similar to those resulting from fossil fuel development. However, the extent of potential impact is unknown because no such research has been completed to quantify wind energy effects on sage-grouse. Several studies are ongoing in Wyoming, but the information is yet to be released. It is also not known to what extent wind farms would mimic gas and oil fields with respect to effects that occur beyond the footprint of ground disturbance, or how the presence of tall towers with turbines would affect sage-grouse. How sage-grouse populations respond to wind energy development could be related to the locations and densities of individual towers, the size and layout of individual wind farms, the density of wind farms across the landscape, and the amount and distribution of support infrastructure (roads, transmission lines). Very little information is currently available to address these data gaps.

The U.S. Fish and Wildlife Service (USFWS) developed “Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines” in July 2003 (USFWS 2003; Manville 2004). Guidelines specific to sage-grouse or with relevance to the species include:

- configuring turbines to maintain areas of contiguous habitat (i.e., avoid fragmentation)
- placing turbines on lands already altered or cultivated and away from areas of intact and healthy native habitats
- avoiding placing turbines within 8 km (5 mi) of known leks
- placing electric power lines underground.

The Montana Governor’s Executive Order No. 10-2014 states that, “Wind energy development should be avoided in sage-grouse core areas. An exception may be made if it can be demonstrated by the project proponent using the best available science that the development will not cause a decline in sage-grouse populations” (page 18). Also, it is stated that, “New wind energy developments are not recommended within 4.0 miles of the perimeter of active sage-grouse leks, unless it can be demonstrated that the development cannot reasonably meet this setback and will not cause a decline in sage grouse populations” (page 21).

Other resources on public lands, which could potentially be impacted by this development, include several Species of Concern; such as golden eagles, peregrine falcons, long-billed curlews, mountain plovers, and several bat species.

The Billings Resource Management Plan and Environmental Impact Statement (DRMP/EIS) is currently being drafted. Decisions concerning large-scale development on public lands would be delayed until the Resource Management Plan is final. The final plan is scheduled to be completed by the end of 2014 or early 2015.

We appreciate the opportunity to comment and believe that large-scale development may be detrimental to the sage-grouse populations and possibly other resources in this area, as such measures to protect these resources should be considered.

Sincerely,

/s/ Craig R. Drake

Acting

James Sparks
Field Manager

faxed on 9/16/14