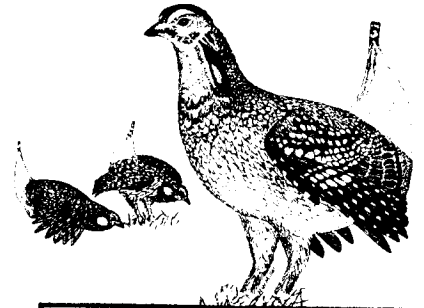




North Dakota Chapter

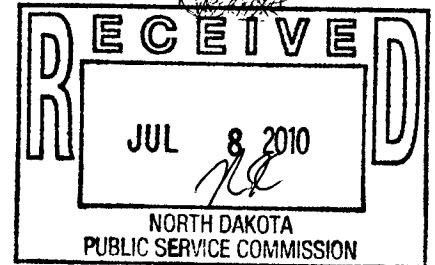
THE WILDLIFE SOCIETY

P.O. BOX 1442 • BISMARCK, ND 58502



July 2, 2010

Chairman Kevin Cramer
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480



Chairman Cramer:

This letter is in response to the public hearing on the application of site compatibility for the Ashtabula III Wind Energy Center in Barnes County, North Dakota. The North Dakota Chapter of The Wildlife Society (Chapter) would like this letter to be included in the record for the final decision on this wind project. The Chapter is generally supportive of the wind industry as a renewable source of “green” energy that can be produced locally. The Chapter is most supportive of wind facilities that are placed in habitats of low value to wildlife, such as cropland in predominantly agricultural landscapes. Currently, the proposed Ashtabula III Wind Energy Center will be placed in such a landscape. The Chapter believes this is the type of landscape that will cause the least harm to wildlife and wildlife habitats, and is pleased to see wind developments occurring in these landscapes.

The Chapter is most concerned about the impacts that wind facilities placed in grasslands, particularly extensive tracts of native prairie, have on ecosystem health and wildlife. In a 2007 report, *Environmental Impacts of Wind-Energy Projects*, by the National Research Council to the U.S. Congress, the Council recognized that the construction and operation of wind-energy facilities directly influence ecosystem structure. These influences include removal of vegetation, disturbance, soil compaction and erosion, and changes in hydrologic features. Wildlife is impacted directly through mortality or indirectly through alteration of habitat and behavioral avoidance. Furthermore, research conducted in various parts of the United States indicates small-scale displacement of songbirds. Specifically, research conducted in Minnesota by South Dakota State University and preliminary research results in North Dakota and South Dakota by the US Geological Survey indicate displacement of some species of grassland songbirds by wind facilities.

Although Ashtabula III is placed in a landscape dominated by agriculture, some turbines may be placed in grasslands. In areas where turbine placement on grasslands is unavoidable, the Chapter urges mitigation in ratios exceeding 1:1. That is to say, for every acre of grassland destroyed, more than an acre should be restored or protected. Native prairie should receive the highest mitigation ratio, followed by planted grasslands. The Chapter realizes that North Dakota currently has no established system for mitigating direct habitat losses associated with wind facilities, but also realizes that Basin Electric Power and BP Alternative Energy and Clipper WindPower Development (for a jointly owned South Dakota project), have committed to voluntary conservation measures. The Chapter applauds these efforts.

The Chapter strongly believes that each new wind facility should be considered in the context of other existing and planned projects in the region. This consideration of cumulative effects should include *all* other anthropogenic impacts in the area, including such things as additional transmission lines, roads, and substations that may or may not be unrelated to wind facilities. On a larger geographic scale, the Chapter

would like to see addressed in the PSC Findings of Fact and Conclusions of Law and Order an analysis of potential cumulative impacts to wildlife and to the environment that factors in the existence of other adjacent wind facilities, such as Ashtabula Wind Project and the Luverne Wind Farm.

The proposed Ashtabula III Wind Energy Project is in an area that may be frequented by raptors. Some wind developers are beginning to write Avian and Bat Protection Plans for their facilities. The Chapter supports the development of such plans, especially if these plans are written in coordination with state and federal natural-resource agencies and address what pre- and post-operational monitoring will be conducted at the respective wind facilities.

The Chapter understands the proprietary nature of the wind industry when dealing with industry competitors over easements and other issues. However, the Chapter urges wind developers to contact state and federal natural-resource agencies early in the planning process to discuss the entire scope of a wind-resource area, and thus, ultimate impact footprint regardless of current regulations. If contacted early, agencies and wind developers can address concerns over potential cumulative impacts, as well as ways to avoid, minimize, or mitigate potential impacts. Although legal, the currently piecemeal approach unfortunately ignores biological realities on the landscape.

Another benefit of early contact with state and federal agencies, as well as other concerned entities, is the opportunity to coordinate efforts to study the potential impacts of wind facilities on wildlife. There are numerous unanswered questions about the impacts of wind facilities on wildlife. Whereas many wind developers conduct pre-operational baseline surveys, and sometimes post-operational monitoring surveys, these surveys are not always pertinent to a particular region. Money might be better spent on surveys of a different nature. For example, in North Dakota, very little is known about rates of bird and bat mortality, or the impacts of turbines on prairie grouse. To our knowledge, very little research is being conducted in the state on these issues. Data from such research would help biologists make better-informed decisions about the impact of wind facilities on wildlife.

Because the Chapter's members are wildlife professionals, the Chapter would be happy to engage wind developers in discussions about our concerns, as well as serving in advisory capacities.

Sincerely,



Jane Austin
President, North Dakota Chapter of The Wildlife Society
701-253-5510

The Wildlife Society is an international, nonprofit, scientific and educational organization composed of professionals, students, and laypersons active and interested in wildlife research, management, education and administration. The NDCTWS is an active affiliate. It is specifically concerned with approaches to effective management of North Dakota's plant and animal communities. The Chapter provides expertise in advising legislative and judicial processes surrounding the controversial management of many natural resource assets. It advocates the holistic treatment of environmental questions. The Chapter was founded in 1963 and incorporated in 1981 under the laws of North Dakota. The NDCTWS would be very willing to engage the PSC in issues concerning wildlife impacts from wind facilities, as well as offer advice based on member's expertise in matters of wildlife management and impacts of human-derived disturbances.