Appendix D
Comments Received During the Scoping Period

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Comments from Public Meetings

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Bureau of Land Management

Public Scoping Meeting

Walker Ridge Wind Generation Facility

Thank you for participating in today's public scoping meeting.

Your comments on the scope and focus of the environmental review are encouraged.

Note: Before including your address, telephone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from individuals identifying themselves as representatives or officials of organizations or businesses will be made available for public inspection in their entirety.

Name (Please Print): Dennis Bradford

Affiliation (If Applicable): Local 551. IBEW

Phone: 707-349.3841 Email: dennishmt@yahoo.com

Address: 336 Robin Hill Dr

City, State, Zip: Lakeport Ca 95453

Comments *(comments will be accepted until October 13, 2010)*

I think that this is a great ~~Idea~~ idea. Green power is always a great thing. The location is also great being very little in the way of people living in that area.

I also would like to work on the project. It would good to be able to work in the County

It would also help the economy of Lake County.

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
Attention: Rich Burns
2550 North State Street
Ukiah, CA 95482

Bureau of Land Management

Public Scoping Meeting

Walker Ridge Wind Generation Facility

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Name (Please Print): Jack Buckhorn

Affiliation (If Applicable): Sonoma, Lake & Mendocino Counties Building & Construction Trades Council

Phone: (707) 477-9140 cell Email: jackb@ibewlocal551.org

Address: 2525 Clevelawd Ave Suite A Santa Rosa CA 95403

City, State, Zip: Santa Rosa CA 95403

Comments *(comments will be accepted until October 13, 2010)*

As a twenty-five year resident of Lake County, I strongly support the Walker Ridge Wind Generation Facility. I have worked in the Building Trades for over 30 years & have never experienced the level of unemployment that currently exists in the trades. We need jobs and the County need the additional tax base.

This project will also help California meet it 33% renewable goals by 2020.

The wages paid to local worker will stay in the local area to stimulate the local economy.

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
Attention: Rich Burns
2550 North State Street
Ukiah, CA 95482

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Name (Please Print): Todd Fronsman

Affiliation (If Applicable): I.B.E.W. 551

Phone: Email: tfronsy@yahoo.com

Address: P.O. Box 917

City, State, Zip: Cobb CA. 95426

Comments *(comments will be accepted until October 13, 2010)*

LAKE County NEEDS THE REVINUE FROM THIS PROJECT.

THE G.I.R. ARE NOT GOING TO BE AN ISSUE.

BUILD AMERICA!

BE GREEN

Todd Fronsman

E-Mail comments to: ukiahwindeis@ca.blm.gov

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Name (Please Print): Chris Snyder; District Representative

Affiliation (If Applicable): International Union of Operating Engineers Local #3

Phone: 415-725-0225 Email: csnyder@oe3.org

Address: 6225 State Farm Drive #100

City, State, Zip: Rohnert Park, CA 94928

Comments *(comments will be accepted until October 13, 2010)*

I am a Representative of Operating Engineers, Local 3. Operating Engineers is suffering over 30% unemployment in our industry in Lake County. Local 3 is fully supportive of the Walker Ridge Wind Farm project. The sooner this project gets under construction the better for employment in Lake County. This project is both good for the environment + employment pictures in Lake County

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
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Ukiah, CA 95482

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Name (Please Print): DWIGHT EVANS

Affiliation (If Applicable): IBEW LOCAL 340

Phone: 530 241-2464 Email: devams@IBEWLOCAL340.ORG

Address: 900 LOCUST ST

City, State, Zip: REDDING CA. 96001

Comments *(comments will be accepted until October 13, 2010)*

We just finished 44 towers on Hatchet Ridge.
We were here to support the Project

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
Attention: Rich Burns
2550 North State Street
Ukiah, CA 95482

Bureau of Land Management

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Name (Please Print): GORDON J. HARRINGTON

Affiliation (If Applicable): U.C. Davis Herbarium

Phone: (530) 787-3714 Email: harrington1207g@yahoo.com

Address: PO Box 683

City, State, Zip: ESPARTO, CA 95627

Comments *(comments will be accepted until October 13, 2010)*

Of particular concern to me is the amount of disturbed land being considered, especially if the project is expanded for whatever reason in the future. The current proposed 29 windmill project disturbs 500 acres, only 100 of which is of permanent use. The areas considered are on dominantly serpentine soil habitats, which contain roughly 90% of the rare plant species along the Ridge. Because of its sensitivity, serpentine soils are almost impossible to remediate back to the natural ecosystem existing prior to disturbance. So my primary concern is how to minimize the waste disturbed land.

Thanks, Gordon J. Harrington

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Ukiah, CA 95482

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Name (Please Print): S. H. Konkol

Affiliation (If Applicable): IBEW Local 340 Sacramento

Phone: 530 365-2327 Email: SHB.Konkol@att.net

Address: 2535 Jason Ct Apt A

City, State, Zip: Auburn Ca 96007

Comments *(comments will be accepted until October 13, 2010)*

I'm In Favor of Wind Project in Calif. I Just Got Done with Hatchet Ridge Project. This Project Sound Like A Better Good One

S H Konkol

Great Presentation

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
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Ukiah, CA 95482

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Name (Please Print): Roberta Lyons

Affiliation (If Applicable): Redbud Audubon Society, Inc.

Phone: (707) 994-2024 Email: robertalyons@att.net

Address: 13806 Cliff Drive

City, State, Zip: Lower Lake, CA 95457

Comments *(comments will be accepted until October 13, 2010)*

See Attached

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
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Ukiah, CA 95482

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Name (Please Print): JOHNNY RAY McCoy

Affiliation (If Applicable): IBEW LU 340

Phone: 530-365-4574 Email:

Address: 2810 N. BAILEY DR.

City, State, Zip: ANDERSON CA.

Comments *(comments will be accepted until October 13, 2010)*

CAME DOWN TO SUPPORT THIS PROJECT

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
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Ukiah, CA 95482

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Name (Please Print): Cynthia Moore

Affiliation (If Applicable): LOCAL 340 IBEW (ELECTRICIANS)

Phone: 916-607-4546 Email: CC

Address: 3245 ERIE RD.

City, State, Zip: MARYSVILLE CA.

Comments *(comments will be accepted until October 13, 2010)*

As an electrician, I have an obvious intrest in this project. But other than obtaining construction work in this area, I am also a supporter of green energy. We need to use our natural resources with the least impact on the environment.

This project is promising due to its location near PG&E's transmission lines and that there is already an existing roadway through the site. This suggests to me that there will be very little impact.

I support this project and look forward to the increase in business for communities in both Lake and Calusa Counties during the project.

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
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Name (Please Print): Thomas Hokoms

Affiliation (If Applicable): Property owner next to S1

Phone: 916-386-2812 Email: hpmthokoms@comcast.net

Address: 15 Gatehouse Court

City, State, Zip: Sacramento Cal 95826

Comments *(comments will be accepted until October 13, 2010)*

We own two 80 acre parcels that look to be next to proposed S2. How will the turbine affect our parcels? How far will they be built from the parcel boundary?

E-Mail comments to: ukiahwindeis@ca.blm.gov

Mail comments to: BLM Ukiah Field Office
Attention: Rich Burns
2550 North State Street
Ukiah, CA 95482

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E-Mails

Note: All attachments are contained in the Letters section following this section.

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Victoria Brandon <vbrandon@lakelive.info>

08/18/2010 10:38 AM

To Richard Burns <Richard_Burns@ca.blm.gov>, ukiahwindeis@ca.blm.gov

cc Jay Halcomb <halcomb@SONIC.NET>, Diane Beck <dfbeck@northcoast.com>, Bob Schneider <verve2006@comcast.net>, Barb Boyle <barb.boyle@sierraclub.org>

Subject Walker Ridge: Sierra Club Redwood Chapter comments

Hi Rich -- the attached letter details the reasons why the Sierra Club Redwood Chapter believes an extension of the scoping period on Alta Gas's Walker Ridge Wind Project is needed.

Best,
Victoria
--
Victoria Brandon
(707) 994 1931
vbrandon@lakelive.info

Click here to report this email as spam.

"Angela ;o)" <angela650@gmail.com>

09/07/2010 04:02 PM

To ukiahwindeis@ca.blm.gov
cc

Subject Walker Ridge Wind Project

Hello,

I would like to be added to the mailing list for the Walker Ridge project.

Angela Amaral
PO Box 3682
Clearlake, CA 95422

We began visiting Indian Valley Reservoir over 2 years ago. We quickly fell in love with the area and began spending every weekend here. Last year we were fortunate enough to be able to purchase a home in Lake County and spend even more time exploring this beautiful place where we can go fishing, hunting, or just sight seeing.

BLM has done such a wonderful job at keeping places like this available to us and our children, and to learn that there may be a wind farm built along Walker Ridge Road is heart breaking. It would be so sad to see even a portion of public land turned into a bunch of unsightly turbines while limiting public access and recreational possibilities. I believe that this would have an effect on the game animals, hunting accessibility, and migratory birds that will be injured or killed by the turbines. The last fire along Walker Ridge was a large one and how will AltaGas ensure that the turbines will not "spark" a wild fire?

This week I traveled over the Altamont Pass and saw so many wind turbines but was wondering why only about half of them were running. Do we really need to build more when we already don't use the ones that we have in place?? With so much growth everywhere else in California, please consider keeping Walker Ridge the way it is. I would love for my grandchildren to be able to enjoy such a beautiful place (even though I am not expecting any grandchildren for at least another 15 years).

Thanks for all you guys do for our environment :)

Angela Amaral

Quote from President Theodore Roosevelt shows his thoughts on how people should treat public land. Thanks you Teddy!!

"In the Grand Canyon, Arizona has a natural wonder which, so far as I know, is in kind absolutely unparalleled throughout the rest of the world. I want to ask you to do one thing in connection with it in your own interest and in the interest of the country - to keep this great wonder of nature as it now is.

I was delighted to learn of the wisdom of the Santa Fe railroad people in deciding not to build their hotel on the brink of the canyon. I hope you will not have a building of any kind, not a summer cottage, a hotel, or anything else, to mar the wonderful grandeur, the sublimity, the great loneliness and beauty of the canyon.

Leave it as it is. You can not improve on it. The ages have been at work on it, and man can only mar it. What you can do is to keep it for your children, your children's children, and for all who come after you, as one of the great sights which every American if he can travel at all should see.

We have gotten past the stage, my fellow-citizens, when we are to be pardoned if we treat any part of our country as something to be skinned for two or three years for the use of the present generation, whether it is the forest, the water, the scenery. Whatever it is, handle it so that your children's children will get the benefit of it."

Click here to report this email as spam.

"Harrison, Susan" <spharrison@ucdavis.edu>

09/14/2010 01:38 PM

To <ukiahwindeis@ca.blm.gov>
cc

Subject Walker Ridge comment

To: Rich Burns, Ukiah Field Office, US Bureau of Land Management
From: Dr. Susan Harrison, UC Davis
Re: Walker Ridge Wind Energy Development
Sept. 14, 2010

Thank you for the opportunity to comment on the proposed wind energy development at Walker Ridge. Together with many colleagues in the environmental sciences, I believe very strongly that Walker Ridge has outstanding biological, ecological, geological, scenic, and wilderness qualities that merit a high degree of protection. We support the California Native Plant Society proposal (October 27, 2005) to make Walker Ridge an Area of Critical Environmental Concern (ACEC); this proposal is full of information on the botanical values and uniqueness of Walker Ridge. Whether through this specific proposal or by other means, we believe that Walker Ridge merits a protective designation, and is unsuitable for high-impact activities including wind energy development. The development of renewable energy is of great importance but should not be done 'at any cost' ecologically. It is our hope that evaluations of ecological appropriateness will influence future planning for alternative energy developments on public lands. Walker Ridge merits a high level of protection because of its rare plants and insects; rich mosaic of intact natural vegetation types; incompletely known, but probably high significance as a migratory corridor for birds, bats, and nonflying mammals; and its wilderness qualities. It is also rich in cultural resources and geologic values, and is a centerpiece in regional conservation efforts (such as the large public investment that has been made to protect adjacent BLM lands and Bear Valley, and a proposal to include Walker Ridge and adjacent public lands as a component of a new National Landscape Conservation Area). Its natural values are vulnerable to alterations of the natural fire cycle, to devastating biological invasions such as barbed goatgrass,and to massive erosion and disruption of its terrestrial and aquatic ecosystems due to heavy disturbance on its steep slopes. Finally, wind energy development will bring adverse visual impacts; raise potential problems with mercury contamination, asbestos and air quality; and undermine public access and recreation.

For all of these reasons, I join many others in asking that wind energy development be targeted away from Walker Ridge and toward sites that are already more heavily altered by human impacts.

Click here to report this email as spam.

"MotoXotica" <Bestdeal@sonic.net>

09/17/2010 03:35 PM

To <ukiahwindeis@ca.blm.gov>

cc

Subject walker ridge windmills

hope i never see a wind mill on walker ridge.would much rather see a bald eagle!please keep me informed.thanks,dan

Click here to report this email as spam.

kodiewolf2000@yahoo.com

10/04/2010 04:54 PM

Please respond to
kodiewolf2000@yahoo.com

To ukiahwindeis@ca.blm.gov

cc

Subject Walker Ridge

Walker Ridge needs to be protected from development. It is an important wildlife corridor and this type of development would interfere with wildlife habitat. Renewable energy is important to developing clean energy alternatives. Walker Ridge is not the place for any kind of development that would negatively impact this wild and remote area and its beautiful scenery and biodiversity. Please protect Walker Ridge from development and keep it a wild place for the good of all wildlife. Thank you. Nicholas Battles and Kodie
Sent from my Verizon Wireless BlackBerry

Click here to report this email as spam.

edelgard brunelle <ebrunelle@att.net>

10/04/2010 04:58 PM

To ukiahwindeis@ca.blm.gov

cc

Subject Walker Ridge

I am very much opposed to the development proposed by Alta Gas in the Walker Ridge Area. I have hiked in all of the public lands in the Cache Creek Area and think it provides a wonderful opportunity to preserve a wild and natural area and habitat for future generations. One of these days all of it should become a State Park.

Sincerely,

Edelgard Brunelle
217 East 8th Street
Davis, CA 95616

Click here to report this email as spam.

Sunny Franson <sunny@pacific.net>

10/04/2010 06:08 PM

To ukiahwindeis@ca.blm.gov
cc

Subject migration corrridors

Dear Ms. LeFebvre,

Will this project impact routes for migratory birds? There are many species that migrate through this area. Additionally, what about those that are protected by the International Migratory Bird Act? Much wildlife migrates, including insects. Also, resident bald eagles, peregrine falcons, other raptors and various species utilize habitat that is in this area or overlaps it, and this project would leave them vulnerable. Hopefully these issues will be addressed.

Thank you.
Sunny Franson

Click here to report this email as spam.

hazel gordon <hazelgordon@hotmail.com>

10/04/2010 09:17 PM

To <ukiahwindeis@ca.blm.gov>
cc

Subject comments on this proposed project

Subject: **Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA**

To:
Rich Burns
BLM Ukiah Field Office
2550 North State Street
Ukiah, CA 95482

Dear Mr. Burns:

I appreciate the opportunity to voice my concern over the use of this fragile landscape for the development of a renewal energy source, wind power.

Walker Ridge is an important wildlife corridor for a significant part of the north and central portions of the state, and the potential fatalities to migratory birds, certain rare and more common butterflies and bats would be an incomparable loss of our natural resources.

In addition, the potential release of mercury from disturbances of these serpentine soils by mechanical means is expected to contaminate soils and waters downslope of this development, increasing the health hazard potential for living creatures, including humans.

Given the increasing loss of our natural landscapes in California and the increasingly greater spiritual need to understand and appreciate these wild settings and ecosystems, I feel that BLM's designation of Walker Ridge as an Area of Critical Environmental Concern would be the greatest and most enduring benefit to the people of California. In this way, it will be appreciated for generations rather than as a short-term commercial enterprise that devalues our natural heritage.

Thank you for allowing me to comment on this project.

Sincerely,
Hazel J. Gordon
2946 Grinnel Drive
Davis, CA 95618

Click here to report this email as spam.

Kimhowfin@aol.com

10/04/2010 08:53 PM

To ukiahwindeis@ca.blm.gov
cc

Subject Walker Ridge Wind Development Plan

I would like to voice my concern re: the Walker Ridge Wind Development Plan.
This is a unique and wild property that would be ruined by such development.
I am a major proponet of alternative energy but the places chosen for placement of wind turbines must take into consideration the wildlife and unique ecology of places such as Walker Ridge.

Thank you for an in-depth study of the impact of heavy infrastructure on such an ecologically sensitive area as Walker Ridge.

Kim Howard
1610 Westshore St.
Davis , Ca 95616

Click here to report this email as spam.

Samantha Pfeifer <pfeifersm@hotmail.com>

10/04/2010 04:40 PM

To <ukiahwindeis@ca.blm.gov>

cc

Subject Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project

Dear Mr. Burns:

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal. Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. **Walker Ridge is simply too wild to develop.** The proposed Walker Ridge Wind Project threatens this area's biological resources, water resources from mercury contamination caused by disturbance of serpentine soils, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed
project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:
The Walker Ridge area is part of an important• wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.
There are potentially significant impacts to migratory birds and• bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.
Five relatively rare• butterflies are found at Walker Ridge. Butterflies are of particular concern because many species, including several of the above, use aggregation on hilltops as an essential part of the mate-finding process.
The question of• how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies is a critical question that needs review and input by the scientific community.
The presence of• mercury (and chromium) in serpentine rocks and soils (USGS reports) on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation—the primary route of mercury discharges—into nearby water sources. The landslide below Indian Valley Reservoir is evidence of instability in this landscape.
The Walker Ridge area contains lands with wilderness• characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.
Walker Ridge is adjacent to Bear Valley, a• renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.
Large• contiguous natural areas, such as the region surrounding Walker Ridge

provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.
The region also provides countless• opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.
The area has high fire potential in the• chaparral plant community
The California Native Plant Society has proposed• the entire Walker Ridge unit as an Area of Critical Environmental Concern which is a better use of the ridge
Development may preclude recreational• opportunities including public use of the ridge road and non-motorized use of the Bald Mountain Trail
The public cannot fairly evaluate the proposed Wind• Development without open access to the wind data information. Alta Gas says it will not reveal this. But, these are public lands and we must know to make reasoned decisions. Without this information we must oppose this project.

All Alternatives must be analyzed including:
1. No Action
2. Designate the entire Walker Ridge Unit as an Area of Critical Environmental Concern. In order to do this the entire 14,000 acre unit must be biologically surveyed and evaluated; Not just the directly affected area or the 8,000 acre Right-of-Way.
3. Alternative locations must be evaluated including the Geysers and Rio Vista
4. No development on the west side of Walker Ridge
5. No development along the Bald Mountain Trail.

Thank you for the opportunity to comment. Please put me on the official notification list on all matters concerning Walker Ridge.

Sincerely,
Samantha Pfeifer
618 Oak Ave, Apt C
Woodland, CA 95695

Click here to report this email as spam.

"Jean Crossley" <jcrossley1@peoplepc.com>

10/05/2010 10:13 AM

To <ukiahwindeis@ca.blm.gov>
cc

Subject walker ridge concern

Dear BLM,
In June of this year, I had the privilege of walking in the Walker Ridge area near the old mines. Due to last year's burn, the wildflowers were spectacular. I am concerned that this area could be developed. I would hope that plenty of studies are done and old ones reviewed to determine the viabiility of wind energy production there. Development there could have a huge impact on water and environmental protection.

Sincerely, Jean Crossley

Click here to report this email as spam.

noknok13@aol.com

10/05/2010 07:59 AM

To ukiahwindeis@ca.blm.gov

cc

Subject Walker Ridge

Please, please don't develop Walker Ridge. At the rate places are being "developed", there won't be any places like that left. There are so many abandoned places and structures that can be redeveloped, why destroy more nature?
Thank you for your time.

Sincerely,

Nijole King

Click here to report this email as spam.

Thomas Wendel <tdwendel@earthlink.net>

10/05/2010 07:24 AM

To ukiahwindeis@ca.blm.gov

cc

Subject Walker Ridge Wind Development

Canadian developer AltaGas has proposed a project that would place heavy infrastructure in this ecologically important area. Although I support the development of renewable energy, California's Walker Ridge is too wild, too beautiful, and too important to wildlife to develop for this purpose and in this manner.

California's Walker Ridge is cherished for its natural beauty, vital wildlife habitat, and recreational opportunities. It is an ecologically important site, and the California Native Plant Society has petitioned that the entire area be protected as an "Area of Critical Environmental Concern" with its many unique and rare plants. The proposed Walker Ridge Wind Project would have significant impacts to the area's biological resources, including mercury contamination of water resources, and alteration of wilderness quality lands.

Renewable energy is an essential part of our nation's clean energy future but some wild places just aren't right for any kind of development. In California, Walker Ridge, located in the chaparral covered hills northwest of Sacramento, is one such place. Energy development here would leave a huge imprint and could interfere with habitat and important wildlife corridors in this remote area of outstanding scenery and biodiversity.

Thanks you for your consideration of my opinion in this matter.

Feel free to contact me if I can provide further information regarding my opposition to this proposal.

Thomas D. Wendel
724 21st Street
Sacramento, CA 95811-1704

Click here to report this email as spam.

"Greg Erdmann" <greg.erdmann@ocas-as.no>

10/06/2010 01:55 PM

To <ukiahwindeis@ca.blm.gov>
cc

Subject Walker Ridge Wind Comments: Bethney Lefebvre

Bethany:

As per this link noting the extension of comments for the Walker Ridge Wind (http://www.blm.gov/ca/st/en/info/newsroom/2010/september/walkerextension.html), I would like to add the following comments:

Has the negative visual impact of all the red, flashing, FAA lights on the turbines been addressed? Wind farm siting and permitting officials can help lower the visual impact of wind farms by recommending the deployment of new AVWS technologies on wind turbines.

While large wind farms generate clean energy, their constantly flashing red strobe lights cause great public annoyance and is usually not noticed until after the wind farm is sited and constructed. The wind farm's legacy can include this "light pollution" and have a tremendous negative impact on the community. For example, a 100-turbine wind farm can have approximately 30-50 turbines with two high-intensity flashing lights on at all times of the night. The effects of these flashing lights on the nearby community should be considered during the wind farm permitting and development process.

Recently approved by the FAA, the new generation of "on-demand" lighting systems solves this problem by **keeping all wind turbine obstruction lights OFF at all times -** unless an aircraft is detected flying on an unsafe heading towards the wind farm. Only then does the turbine-based radar system turn the lights on for aircraft safety, and turn the lights off when the aircraft exits the airspace. An Audio Visual Warning System (AVWS) is an on-demand lighting solution. *Wind siting and permitting officials can request wind power developers to implement an AVWS into their wind farms to reduce these adverse visual impacts in your communities.*

An AVWS will benefit your community by:

- Lowering the overall visual impact of wind farms by reducing "light pollution" (constantly flashing red FAA strobe lights) which cause great public annoyance in nearby communities.
- Increasing public acceptance in wind energy-producing communities.
- Fostering more responsible siting practices and therefore overall positive and growth in the wind industry.

Feel free to contact me if you would like further information.

Greg Erdmann
OCAS, Inc.
For technology demo: www.ocasinc.com
(802)-878-8356

PS: We have been working on similar issues with the BLM field offices in Wyoming and Nevada.

Click here to report this email as spam.

Roberta L Millstein <yolohiker@RLM.net>

10/06/2010 01:40 PM

To ukiahwindeis@ca.blm.gov

cc

Subject Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Mr. Burns:

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal. Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water resources from mercury contamination caused by disturbance of serpentine soils, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

- The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

- There are potentially significant impacts to migratory birds and bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

- Five relatively rare butterflies are found at Walker Ridge. Butterflies are of particular concern because many species, including several of the above, use aggregation on hilltops as an essential part of the mate-finding process.

- The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies is a critical question that needs review and input by the scientific community.

- The presence of mercury (and chromium) in serpentine rocks and soils (USGS reports) on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation-the primary route of mercury discharges-into nearby water sources. The landslide below Indian Valley Reservoir is evidence of instability in this landscape.

- The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

- Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

- Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

- The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

- The area has high fire potential in the chaparral plant community

- The California Native Plant Society has proposed the entire Walker Ridge unit as an Area of Critical Environmental Concern which is a better use of the ridge

- Development may preclude recreational opportunities including public use of the ridge road and non-motorized use of the Bald Mountain Trail

- The public cannot fairly evaluate the proposed Wind Development without open access to the wind data information. Alta Gas says it will not reveal this. But, these are public lands and we must know to make reasoned decisions. Without this information we must oppose this project.

All Alternatives must be analyzed including:

1. No Action
2. Designate the entire Walker Ridge Unit as an Area of Critical Environmental Concern. In order to do this the entire 14,000 acre unit must be biologically surveyed and evaluated; Not just the directly affected area or the 8,000 acre Right-of-Way.
3. Alternative locations must be evaluated including the Geysers and Rio Vista
4. No development on the west side of Walker Ridge
5. No development along the Bald Mountain Trail.

Thank you for the opportunity to comment. Please put me on the official notification list on all matters concerning Walker Ridge.

Sincerely,

Roberta Millstein
562 Reed Dr
Davis, CA 95616

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Mishika Rosendin <mishikasings@gmail.com>

10/06/2010 08:21 PM

To ukiahwindeis@ca.blm.gov

cc

Subject No on Walker Ridge Project

To whom it may concern- I support renewable energy development and understand it's benefits, but agree only on the condition that the negative impact on the indigenous fauna and flora is not too great. In the case of Walker Ridge, I believe the costs would far exceed the gain. True nature is becoming so rare, and this is a precious jewel. Please help preserve this very important place. Please do not approve the Walker Ridge Project!

Click here to report this email as spam.

Paul Friesema <pfree@northwestern.edu>

10/07/2010 11:07 AM

To ukiahwindeis@ca.blm.gov

cc

Subject Walker Ridge Wind Project EIS process

Hello Bethney.Please put me on the mailing list for this project, from scoping notices and summaries all the way through the NEPA process to the Record of Decision. Please send material to:

Professor Paul Friesema
Environmental Policy and Culture Program
304 Scott Hall, Northwestern University
Evanston, IL. 60208-1006

Thank you! Paul Friesema

Eileen Karsten <ekarsten4@yahoo.com>
Sent by: Site Administrator <action@tws.org>

To ukiahwindeis@ca.blm.gov
cc

10/07/2010 01:54 PM

Subject Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Please respond to
Eileen Karsten <ekarsten4@yahoo.com>

Oct 7, 2010

Mr. Rich Burns
2550 North State Street
Ukiah, CA 95482

Dear Mr. Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can

proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,

Ms. Eileen Karsten
78650 Ave 42nd #1908
Bermuda Dunes, CA 92203
(760) 567-9944

Click here to report this email as spam.

"Pam Nieberg" <pnieberg@dcn.org>

10/07/2010 01:46 PM

To <ukiahwindeis@ca.blm.gov>
cc

Subject Walker Ridge Wind Development

Dear Mr. Burns:

Attached is a letter with scoping comments on the Walker Ridge Wind Development for consideration in the BLM's Draft Environmental Impact Statement (joint EIS/EIR) from the Sierra Club Yolano Group. Thank you for the opportunity to comment on the project.

If you have any questions, please contact me at:

Pam Nieberg
3010 Loyola Drive
Davis, CA 95618
530-756-6856
pnieberg@dcn.davis.ca.us

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Misha Popov <mpopov+sacto@convio.com>
Sent by: Site Administrator <action@tws.org>

To ukiahwindeis@ca.blm.gov
cc

10/07/2010 01:49 PM

Subject Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Please respond to
Misha Popov <mpopov+sacto@convio.com>

Oct 7, 2010

Mr. Rich Burns
2550 North State Street
Ukiah, CA 95482

Dear Mr. Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can

proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,

Mr. Misha Popov
5431 Auburn Blvd
Sacramento, CA 95841-2801
(410) 451-5926

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Dana Stokes <des835@sbcglobal.net>

10/07/2010 10:38 PM

To ukiahwindeis@ca.blm.gov
cc

Subject comments on EIS for Walker Ridge Wind Project

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

BLM Ukiah Field Office
Attention: Rich Burns
2550 North State Street
Ukiah, CA 95482

Dear Mr. Burns:

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal. Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. While I support renewable energy, it should not be developed in pristine wilderness areas. The proposed Walker Ridge Wind Project threatens this area's biological resources, water resources scenic beauty, wilderness characteristics, and the overall conservation values of the region. More appropriate locations for large wind farms exist nearby in areas already disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

The Walker Ridge area is part of an important wildlife corridor of• unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

There is evidence that this area may be critical• for migrating birds who could be harmed by wind turbine blades.

Five relatively rare butterflies are found• at Walker Ridge. Butterflies are of particular concern because many species, including several of the above, use aggregation on hilltops as an essential part of the mate-finding process.

The presence of mercury (and chromium) in• serpentine rocks and soils (USGS reports) on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale

earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation—the primary route of mercury discharges—into nearby water sources. The landslide below Indian Valley Reservoir is evidence of instability in this landscape.

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preclude recreational opportunities including public use of the ridge road and non-motorized use of the Bald Mountain Trail.

The area has high• fire potential in the chaparral plant community

• The California Native Plant Society has proposed the entire Walker Ridge unit as an Area of Critical Environmental Concern which is a better use of the ridge

The public cannot fairly• evaluate the proposed Walker Ridge Wind Development project
without open access to Alta Gas' wind data information which it has refused to reveal. Since
these are public lands, the public is entitled to see this data to make reasoned decisions. Without
this information we must oppose this project.

All Alternatives must be analyzed including:

1. No Action
2. Designate the entire Walker Ridge Unit as an Area of Critical Environmental Concern. In order to do this the entire 14,000 acre unit must be biologically surveyed and evaluated; Not just the directly affected area or the 8,000 acre Right-of-Way.
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4. No development on the west side of Walker Ridge
5. No development along the Bald Mountain Trail.

Thank you for the opportunity to comment. Please put me on the official notification list on all matters concerning Walker Ridge.

Sincerely,

Dana Stokes
835 A St.
Davis, CA 95616

Click here to report this email as spam.

Michael Zelner <michaelz@zoka.com>
Sent by: Site Administrator <action@tws.org>

To ukiahwindeis@ca.blm.gov
cc

10/07/2010 01:54 PM

Subject Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Please respond to
Michael Zelner <michaelz@zoka.com>

Oct 7, 2010

Mr. Rich Burns
2550 North State Street
Ukiah, CA 95482

Dear Mr. Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

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-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

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-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,

Mr. Michael Zelner
646 Kennedy St Apt 110
Oakland, CA 94606-5320

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"Ellen Dean" <eadean@ucdavis.edu>

10/08/2010 03:06 PM

To ukiahwindeis@ca.blm.gov

cc

Subject comments on Walker Ridge Wind Energy Development

Hello Ukiah office:
Although I support renewable energy development, especially solar energy,
I support it when it is installed in a place that makes sense and doesn't
destroy remaining fragile California ecosystems. This rush to install
renewable energy on federal BLM lands that are sometimes the last remnants
of previously widely distributed ecosystems does not make sense to me. We
have so much land that has been disturbed and paved over that can be used
for renewable energy development, placing a new development on top of
fragile and rare soils and plants, such as those found on Walker Ridge is
a sad commentary on our priorities as a society. The ridge has been a
training ground for generations of botanists, due to its interesting and
rare flora. One can only hope that the botanists hired to examine the
areas that will be disturbed by this project know what the rare plants of
Walker Ridge look like in all their stages.

I also object to this project, because due to the marginal wind potential
on Walker Ridge, this development would not be viable without taxpayer
subsidies and free land. Yet, the project will disturb the entire ridge,
introducing and spreading new weeds, widening roads and creating new ones,
placing concrete structures and turbines that will need to be protected
from future wildfires and recreational users. How long do you think it
will be before the turbines are used for target practice? The project will
create new problems for the BLM while providing marginal energy resources.
The resources required to protect this development from wildfires, such as
the 2008 fire that burned much of the ridge, will be extremely costly to
the state of California.

Finally, I also find wind turbine developments troubling due to their
destruction of birds and bats. Placing a development like this just west
of major bird refuges in the Sacramento Valley seems like a disaster
waiting to happen.

Thank you for the chance to provide this comment. I hope that your office
makes the right decision with regard to this development.

Ellen Dean
Curator, UC Davis Center for Plant Diversity (herbarium - DAV)
Plant Sciences, Mail Stop 7
One Shields Ave.
University of California
Davis, CA 95616
Phone (530) 752-1091

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Thomas Meagher/CASO/CA/BLM/DOI

10/08/2010 05:31 PM

To ukiahwindeis@ca.blm.gov

cc

Subject walker ridge construction

Hello Ukiah - Nice presentation on Oct 8 !

To reiterate my comment from the October 8th meeting, Section 2.7 could better address the following: The site design engineers need to pay attention to the disposal of excess excavated material from road and turbine flat pad construction. Not just in the temporary construction phase that would be covered in the SWPPP (stormwater pollution prevention plan) , but for the long term. Excavation section should require that excess soil be placed and compacted in designed , stable areas, then amended, seeded and mulched appropriately to minimize long term sediment.

At one windfarm near Palm springs, I observed some turbine pads that were constructed by pushing soil and rock off the side of the hill, leaving erodable, highly visible and sediment generating steep fill areas.

Thanks , Tom Meagher, BLM, Sacramento

Semi interesting bird strike info from Wikipedia:

Birds

Danger to birds is often the main complaint against the installation of a wind turbine. However, a study[25] estimates that wind farms are responsible for 0.3 to 0.4 fatalities per gigawatt-hour (GWh) of electricity while fossil-fueled power stations are responsible for about 5.2 fatalities per GWh. The author's study therefore claims that fossil fuel based electricity causes about 10 times more fatalities than wind farm based electricity, primarily due to habitat alteration from pollution and mountain-top removal. The number of birds killed by wind turbines is also negligible when compared to the number that die as a result of other human activities such as traffic, hunting, electric power transmission and high-rise buildings, and the introduction of feral and roaming domestic cats,[26]. For example, in the UK, where there are several hundred turbines, about one bird is killed per turbine per year; 10 million per year are killed by cars alone.[27] In the United States, turbines kill 70,000 birds per year, compared to 80,000 killed by aircraft,[28] 57 million killed by cars, 97.5 million killed by collisions with plate glass,[29] and hundreds of millions killed by cats.[26] An article in *Nature* stated that each wind turbine kills an average of 4.27 birds per year.[30]

In the UK, the Royal Society for the Protection of Birds (RSPB) concluded that "The available evidence suggests that appropriately positioned wind farms do not pose a significant hazard for birds."[6] It notes that climate change poses a much more significant threat to wildlife, and therefore supports wind farms and other forms of renewable energy. In 2009, however, the RSPB warned that "numbers of several breeding birds of high conservation concern are reduced close to wind turbines," probably because "birds may use areas close to the turbines less often than would be expected, potentially reducing the carrying capacity of an area."[31] The National Audubon Society in the U.S. takes a similar position, broadly supporting wind power to help mitigate global warming, while cautioning against siting wind farms in areas especially important to birds and other affected wildlife.[32]

In some cases, the mere presence of wind turbines or transmission towers can affect threatened species, by restricting their range, thus fragmenting breeding populations.[5] The U.S. Fish and Wildlife Service has issued voluntary guidelines for the siting of wind energy facilities in the United States. These guidelines make recommendations regarding siting which include avoiding placement in 1) areas documented as the location of any species protected under the Endangered Species Act, 2) in local bird migration pathways or areas where birds concentrate, 3) near landscape features that attract raptors, 4) in a configuration that is likely to cause bird mortality, and 5) where fragmentation of large contiguous tracts of wildlife habitat will occur as a result of turbine placement.[33] The wind industry is resisting such regulations.[5]

The Peñascal Wind Power Project in Texas is located in the middle of a major bird migration route, and the wind farm uses avian radar originally developed for NASA and the United States Air Force to detect birds as far as four miles away. If the system determines that the birds are in danger of running into the rotating blades, it shuts down the turbines. The system automatically restarts the turbines when the birds have passed.[34] At the Altamont Pass Wind Farm in California, continued efforts to reduce raptor and other bird mortality, including seasonal shutdowns, have proved ineffective. It is currently concluded that "larger modern turbines would substantially, if not significantly, reduce the number of raptors killed per megawatt of power produced at the APWRA."[35]

Some paths of bird migration, particularly for birds that fly by night, are unknown. A study suggests that migrating birds may avoid the large turbines,[36] at least in the low-wind non-twilight conditions studied. A Danish 2005 (Biology Letters 2005:336) study showed that radio tagged migrating birds traveled around offshore wind farms, with less than 1% of migrating birds passing an offshore wind farm in Rønde, Denmark, got close to collision, though the site was studied only during low-wind non-twilight conditions.

Bats

The numbers of bats killed by existing onshore and near-shore facilities has troubled bat enthusiasts.[37] A study in 2004 estimated that over 2200 bats were killed by 63 onshore turbines in just six weeks at two sites in the eastern U.S.[38] This study suggests some onshore and near-shore sites may be particularly hazardous to local bat populations and more research is needed. Migratory bat species appear to be particularly at risk, especially during key movement periods (spring and more importantly in fall). Lasiurines such as the hoary bat, red bat, and the silver-haired bat appear to be most vulnerable at North American sites. Almost nothing is known about current populations of these species and the impact on bat numbers as a result of mortality at windpower locations. It has been suggested that bats are attracted to these structures in search of roosts.[39] Offshore wind sites 10 km (6 mi) or more from shore do not interact with bat populations.[*citation needed*]

Scientists at the U.S. Geological Survey have already conducted research using stable isotope analysis to track migration among terrestrial mammals. USGS scientists are currently applying this technique in their efforts to figure out the geographic origins of bats killed by wind turbines. [40]

Bats may be injured by direct impact with turbine blades, towers, or transmission lines. Recent research shows that bats may also be killed when suddenly passing through a low air pressure region surrounding the turbine blade tips. The low pressure causes barotrauma, damage to the bat's lungs. [41] Birds have more rigid lungs and are not affected by the low pressure zone.[42]

In April 2009 the Bats and Wind Energy Cooperative released initial study results showing a 73% drop in bat fatalities when wind farm operations are stopped during low wind conditions, when bats are most active.[43]

Bats avoid radar transmitters, and placing microwave transmitters on wind turbine towers may reduce the number of bat collisions.[44][45]

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"Ryan O'Dell" <reodell@ucdavis.edu>

10/08/2010 08:47 AM

To ukiahwindeis@ca.blm.gov

cc

Subject Submission of public scoping comments

I am submitting (see attached) my public scoping comments regarding the Walker Ridge Wind Project DEIS.

Ryan O'Dell

Click here to report this email as spam.

":caleb" <belac@juno.com>

10/09/2010 10:52 PM

To ukiahwindeis@ca.blm.gov

cc

Subject walker ridge wind farm comments

Walker Ridge Wind Generation Facility

Comments:

There is no question to the fact that wind energy is clean and limitless; the question is always if that the proposed wind farm will be of detrimental impact to the local eco-environment.

There are the hazards to local birds.

There are potential electrical fires caused by mechanical failures in the turbines. After all, the area is listed as a “high fire hazard zone”. It would not take much more than a spark to light up miles around.

There are the noises, sub-frequencies and otherwise, that the numerous giant turbines will emit that may or may not affect living things neurologically.

It seems that there is generally only talk about the environment. What about the people? There are people that have homes near by the proposed site. I, for one have my home just about 2 miles (as the crow flies) from the proposed site. I am a great proponent of renewable energy. I am, after all fully off grid and self fulfilled by solar energy. My family and I built on this land with our own hard sweat. I have my home, my family, and livestock on this land. So it is natural for my concerns regarding this project. If and when any of the potential issues above occur, how are we to be compensated? Would we be compensated? Our home would be rendered useless. Unlivable and unsellable. It would take at least a couple of million of dollars for us to relocate our lives. The truth is that it will be our lives rather than our home that would be threatened. All that we have put into the place will be lost. All the future that we foresaw on the land will not come to pass.

Wind energy sounds wonderful, but being so close in the line of fire makes that more a fear.

sincerely,
Caleb Huynh
530-400-8359
446 mule skinner rd
clearlake oaks, ca 95423

Click here to report this email as spam.

"Jim Owen" <jowen@sonic.net>

10/11/2010 04:48 PM

To <ukiahwindeis@ca.blm.gov>
cc "'Aggie Gabrielsen'" <agabrielsen@gabrielsen.com>
Subject Walker Ridge Wind Park - comments submission

Dear Mr. Burns:

As we discussed on the phone last week, we are in strong opposition to the proposed industrial wind park on Walker Ridge.

In fact, I believe that you will find that every private land owner in Bear Valley from Highway 20 to Brim Road is in opposition to this project.

We sincerely hope that you will help keep this unique serpentine undeveloped area from becoming just another industrial development.

Sincerely,
Gabrielsen & Company
Bear Valley Ranch LLC

Jim Owen

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Ronald Oertel <roertel@msn.com>

10/11/2010 09:41 AM

To <ukiahwindeis@ca.blm.gov>
cc

Subject Opposed to Walker Ridge Wind Development

Hello:

We are writing this email to express our opposition to the proposed Walker Ridge wind development project. Such a development would endanger and interfere with wildlife, possibly impact recreational opportunities such as hiking, and would set a bad precedent for the area.

In general, we feel that public lands exist for the benefit of all (including wildlife). Profit-generating ventures such as the proposed wind development should be located on the ample number of privately-owned lands, instead.

Sincerely,

Ronald Oertel & Somkiat Ashton
2211 Somerset Circle
Woodland, CA 95776

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"Roberta Lyons" <roberta.lyons@att.net>

10/12/2010 04:18 PM

To <ukiahwindeis@ca.blm.gov>

cc

Subject Wind generation comments

Hi Rich,
I'm also sending an attached copy of what I emailed you. Could you let me know by tomorrow if you got this ok? I don't want to miss the deadline. Got to this at the last minute because I've been involved with Land Trust stuff!
Love Roberta

Click here to report this email as spam.

"Roberta Lyons" <roberta.lyons@att.net>

10/12/2010 04:06 PM

To <ukiahwindeis@ca.blm.gov>
cc

Subject Wind Farm comments from Redbud Audubon

Dear Rich,
Following are comments from Redbud Audubon regarding the proposed Walker Ridge Wind Generation Facility. I will mail a hard-copy tomorrow but wanted to be sure I made the deadline.
Sincerely
Roberta Lyons

Comments on the Walker Ridge Wind Generation Facility scoping and focus of environmental review

Oct. 12, 2010

Roberta Lyons
Conservation Chair
Redbud Audubon Society, Inc.
(707) 994-2024 roberta.lyons@att.net
13806 Cliff Drive
Lower Lake, CA 95457

The Redbud Audubon Society, Inc., of Lake County is extremely concerned with the possible impacts the proposed Walker Ridge Wind Generation Facility will have on a variety of resident and migratory bird species as well as bats. As Conservation Chair for the society, I'm commenting on the scope and focus of the proposed environmental review with some specific areas of concern.

One of our main concerns with the wind farm Environmental Impact Statement (EIS), is how will the bird study accurately determine impacts on resident and migratory bird species and bats in the formation of the baseline data? We are concerned that no night time studies are planned to determine whether there are night time migrations occurring over or near the sight. This is a concern for the migration habits of the Western and Clark's grebes as well as other night time flyers, like owls, other birds, and bats. We believe it will be prudent to begin the study assuming that birds fly/migrate between Clear Lake, Indian Valley Reservoir, the Central Valley, the Coast, and the Bay Area until the study shows otherwise or there is existing data showing no such migration routes occur.

How will it be determined that the wind farm is or is not a night time threat if night time surveys are not conducted? Grebes migrating to Clear Lake sometimes number in the thousands.

Once it is determined what species are affected and what the mortality rate for each species is, will there be a determination of the cumulative mortality (not just this wind farm but others along the West Coast) for each species? How will that mortality affect the survivability of the species in our area and region, and within the migratory range of the species? What agency sets the acceptable mortality rates? Regardless of the rates, increased mortality will affect the number of birds seen/experienced by residents of this region (Lake and Colusa counties). Who determines what acceptable mortality is for the residents of Lake and surrounding counties?

In conclusion:

- There should be night monitoring for migratory birds, owls and bats for use in preparation of the baseline data for the EIS.
- A cumulative impact report of wind farms along the West Coast on bird mortality and species survival is needed.
- The California Energy Commission's *Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development* should be used in developing the mitigation plan.
- Establishment of a concrete and meaningful mitigation plan is needed. It should include compensatory mitigation, detailed monitoring methodologies and requirements, adaptive operations, and mitigation mechanisms.
- A technical advisory committee should be established. This committee would oversee the mitigations monitoring and reporting program to review data and make recommendations for the implementation of adaptive mitigation measures. This committee should include members from a non-profit organization dedicated to conservation.

Sincerely,
Roberta Lyons
Conservation Chair
Redbud Audubon Society, Inc.

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richard miller <drrichardlmiller@gmail.com>

10/12/2010 05:56 PM

To

cc

Subject Walker Ridge proposed development

Wilbur Hot Springs

Established 1865
In All The World No Waters Like These
530 473 2306

To: Rich Burns, Manager, Bureau of Land Management Field Office
Ukiah, California

Re: Alta Gas of Canada, Proposed Industrial Development of Wind Park,
Walker Ridge Road

Dear Rich:

Since 1971 I have been the owner of the property, in Colusa County, known as the Wilbur Hot Springs Health Sanctuary (240 acres) and the Wilbur Springs Nature Preserve (1560 acres) which contains a conservation easement placed by myself in 1999.
The historic hotel and medicinal hot springs have served the public continuously since 1865. The Wilbur Springs Nature Preserve shares a boundary with Walker Ridge and is a unique piece of land containing flora, fauna and wildlife.

We, at Wilbur Hot Springs, have been pioneers in what is now called "green energy" for the past 38 years. One example of this is the fact that the property, and business, is off the power grid and we produce our electrical energy with photo voltaic cells.

We have been informed by Peter Eaton, of the Canadian exploration and development company, Alta Gas, that they propose building an Industrial Wind Park with 29 to 40, 410 foot high, wind turbines, along the Walker Ridge.

I have many concerns about the effects of this project on my 145 year old business, on the Nature Preserve, on its inhabitants and guests and on my family home on the property

Given my lifelong commitment to what is now called "alternative energy" I find it quite awkward to here express my deep concerns about a wind farm. However, there is a law of unintended consequences which we must be mindful of. It was not that long ago that we thought unregulated mercury mining, building with asbestos, drilling in the ocean, taking all drugs passed by the FDA , throwing sewage in the stream and spraying

pesticides on rice fields and cattle grass were safe endeavors.

I here list some of my concerns about the proposed building of what is, in effect, an industrial plant, on BLM land, containing the Walker Ridge, which looks down upon a Nature Preserve, created at huge personal expense, protected by law in perpetuity, to provide a safe, healthy pristine environment for humans and other indigenous wildlife.
,

1-Sound pollution:

The decibel level in the Nature Preserve was measured, over a period of a year, by the engineering firm, Dames and Moore, as being quieter than the average library in the United States. The wind turbines will each produce between 50 and 60 decibels of sounds which will have a negative effect on my home and business as well as on the personal health of all who are impacted. The negative effects on health of sound pollution are well documented by science. Admissions to mental hospitals of those living near airports are triple and quadruple the norm.

2-Light pollution:

Presently star watching is a popular activity in the Nature Preserve. This is possible because there are no man made light sources in the valley which would normally interfere with such activity. In fact, the entire property is off grid.
The Alta Gas representative, Mr Eaton, told me that every one of the wind turbines will have to produce light in accord with FAA regulations in order to properly warn airplanes of their existence. The combined effect of FAA specified lighting will have a significant disruptive effect on the ambiance of the Nature Preserve, my business and my home.

3-Aesthetics:

Placing an industrial Wind Park, in view of and in ear shot of, a Nature Preserve will ruin the Nature Preserve. The two activities are mutually exclusive. This industrial plant, if allowed, will have a disastrous effect upon my 145 year old business.

4-Hazardous materials contamination:

Part of the Nature Preserve is in a valley below the proposed Wind Park. Gravity will bring any and all contamination produced, during construction or thereafter, directly down the hill, onto the Nature Preserve and into the aquifers. There is a possibility that our drinking water will be contaminated.

5-Fire hazard and increased access:

The fire that destroyed over 14,000 acres a few years ago was caused by a truck driving in tall grass during the dry season. Mr Eaton of Alta Gas informed me that this wind project will be a major attraction to the many tourists who want to stand near or under a wind farm. The turbines will thus increase traffic along Walker Ridge. We already

have a problem with poachers coming down onto our Nature Preserve from Walker Ridge road. If, and when, the turbines bring more people they will also bring more poachers. Furthermore, by improving Walker Ridge road the entire back country will be more easily accessible to those who would use it for some illegal purposes such as the commercial growing of marijuana. It is well known that chimerical marijuana growers have an extremely negative effect upon the environment in addition to the fact that their presence is a danger to those in the vicinity.

6-Danger to flying animals:

The danger to flying animals presented by wind turbines is well documented.

7-Economics:

The initial phase of this project requires a capitol investment of $180,000,000. Of that sum approximately $80,000,000 is for the infrastructure and improvements and $100,000,000 for the turbines. From a cost benefit perspective it will make economic sense to build additional turbines on the site since $80,000,000 has already been spent for infrastructure. Additional turbines should only cost about $3,000,000 each.

However, Alta Gas has represented that they will not build additional turbines in the Walker Ridge area because only one area on the ridge has the elevation necessary for the wind generation and this area will be completely used by the 29-40 proposed turbines which have a cement foot print of 60 feet in diameter.

Therefore, this project does not make economic sense. Why would a corporation spend $80,000,000 on initial infrastructure when it is known in advance that the project is limited in scope to the initial build? Either Alta Gas already knows that this is merely an initial phase of a much larger project, but are not saying so up front for fear of appearing too large, or their capital investment simply does not make economic sense.

All entities, public and private, need a great deal of additional information so we may be clear, in advance, of the full scope and consequences of this proposed project under consideration, and be able to make informed, responsible and equitable decisions.

Respectfully,

Richard Louis Miller, M.A., Ph.D.

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"Jim Owen" <jowen@sonic.net>

10/12/2010 05:22 PM

To <ukiahwindeis@ca.blm.gov>

cc

Subject Opposition to Walker Ridge Wind Farm

Dear Mr. Burns:

I am forwarding to you a letter from Ms. Lucille Penning and Catherine Townzen. These Bear Valley land owners share our opposition to this project.

Sincerely,

Jim Owen

Click here to report this email as spam.

Victoria Brandon <vbrandon@wildblue.net>

10/13/2010 12:46 PM

To ukiahwindeis@ca.blm.gov
cc Richard Burns <Richard_Burns@ca.blm.gov>
Subject Walker Ridge Wind Project

Scoping comments from the Sierra Club Redwood Chapter are attached

--
Victoria Brandon
(707) 994 1931
vbrandon@lakelive.info

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"Michael Delbar" <mdelbar@rangelandtrust.org>

10/13/2010 12:11 PM

To <ukiahwindeis@ca.blm.gov>
cc

Subject Comments on Scope

Attached please find the comments of the California Rangeland Trust regarding the Walker Ridge Windpower Project NOP. The original was sent today via US mail.

Please feel free to contact me should you have any questions.

Regards,

Michael Delbar

Michael M. Delbar
Chief Operating Officer
California Rangeland Trust
1225 H Street
Sacramento, CA 95814
916.444.2096
mdelbar@rangelandtrust.org
www.rangelandtrust.org

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Chris Lish <lishchris@yahoo.com>

10/13/2010 10:11 AM

To ukiahwindeis@ca.blm.gov

cc

Subject Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Bethney Lefebvre

Bureau of Land Management

Ukiah Field Office

2550 North State St.

Ukiah, CA 95482

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

The Bureau of Land Management should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by

industrial use, agricultural lands, and lands with low resource values.

"Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish-indeed, all the living creatures of prairie and woodland and seashore-from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement."

-- Theodore Roosevelt

Wind energy development is inappropriate at this site for the following reasons:

* The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

* There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

* Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

* The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

* The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-

tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

* The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

* Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

* Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

* The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,

Christopher Lish

PO Box 113

Olema, CA 94950

lishchris@yahoo.com

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Katherine Mawdsley <wfm-kfm@pacbell.net>

10/13/2010 04:37 PM

To ukiahwindeis@ca.blm.gov

cc

Subject Comments on Walker Ridge Wind Energy Development

Ukiah Field Office
U.S. Bureau of Land Management

RE: Comments on Walker Ridge Wind Energy Development

Thank you for the opportunity to comment on this proposal, even though I do so at the last minute. I'm ten days back from a fairly long trip to Australia, during which I saw many wind turbines and lots of solar energy. Only the importance of Walker Ridge as a resource for regional plant science in the southern Sacramento Valley prompts me to put aside my accumulated mail and try to get this to you before your deadline.

The Plan of Development dated June 24, 2010, a copy of which I obtained at the Oct. 8 comment meeting at your office in Sacramento, expresses succinctly the basis for my concern about the proposed project—much as I share the desire for providing more renewable energy. On page 5-1 it notes: "The Ukiah FO's diverse landscape provides habitat for several special status plants. The most notable among these depend on (are obligates of) the area's specific geologic features and soils."

That chapter goes on to list the twelve special status plants found on Walker Ridge. I am only an amateur botanist, but know most of them. And I know them from Walker Ridge. I first botanized that area about 1990 on a field trip led by the late eminent botanist G. Ledyard Stebbins, Distinguished Professor Emeritus at UC Davis. Ledyard knew all the "good spots" for rare plants and gorgeous spring displays in California, and Walker Ridge was high on his list. Its importance as a refuge for plants whose other habitats had been eradicated by development has been recognized for decades.

I was at Walker Ridge most recently this past May, when I was part of a scouting party for the UC Davis California Floristics class. We drove along Walker Ridge Road, making many stops and finding important and interesting species, including many of the Special Species, within 20 feet or less of the paved surface.

I appreciate the recognition in the Plan document of the importance of minimizing disturbance in constructing renewable energy facilities. But, quite honestly, the soils of Walker Ridge are so fragile and rare that the disturbance that would be absolutely unavoidable would be a disaster for the habitat.

I attended the 8 October 2010 comment meeting at your offices in Sacramento and was encouraged by the positive tone of all the speakers, both from the agency and the public (and probably the applicant, although I did not clearly identify an applicant representative). I hope the same commitment to using science and good analysis will

prevail in your continuing analysis.

Thank you again for the opportunity to comment.

Katherine F. Mawdsley
1211 Stanford Place
Davis CA 95616

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Mike Painter <mike@caluwild.org>

10/13/2010 04:35 PM

To ukiahwindeis@ca.blm.gov
cc

Subject Scoping Comments for the Walker Ridge Wind Project EIS

October 13, 2010

Mr. Rich Burns
Field Manager
Bureau of Land Management
Ukiah Field Office
2550 North State Street
Ukiah, CA 95482

Via email: ukiahwindeis@ca.blm.gov

RE: Scoping Comments for the Walker Ridge Wind Project EIS

Dear Mr. Burns:

I am writing on behalf of the more than 780 members and supporters of Californians for Western Wilderness (CalUWild), an unincorporated citizens organization dedicated to encouraging and facilitating citizen participation in legislative and administrative actions affecting wilderness and other public lands in the West. Our members use and enjoy the public lands in California and all over the West.

CalUWild fully supports alternative energy, in addition to conservation measures. But those projects must be sited in appropriate places. Walker Ridge is not one of those places.

Walker Ridge has been proposed for inclusion on the National Wilderness Conservation System. We support that eventual designation.

Walker Ridge has also been proposed for inclusion in a Snow Mountain-Berryessa National Conservation Area. We support that proposal.

Walker Ridge has been nominated in 2005 by the California Native Plant Society as an Area of Critical Environmental Concern. We support that nomination.

These three proposed protective schemes indicate that Walker Ridge has great ecological value, far exceeding its value for energy development. Energy development can occur elsewhere, on land that it is already disturbed.

Therefore, we strongly urge you to make the “No Action” Alternative your preferred alternative when you complete your Draft Environmental Impact Statement.

Among the attributes deserving of protection are:

Wilderness character;
Connectivity to other wild areas, crucial for use as migration corridors; and
Presence of rare plants and animals

The DEIS must address the planned project’s impacts on these resources, as well as more generalized impacts on bird and land mammal migration, recreation opportunities, soils, fire susceptibility, erosion from road construction, other land protection efforts.

Please notify us when the DEIS for this project is released, and please also add CalUWild to your official notification list of interested parties for this and future similar projects.

Thank you for your consideration.

Respectfully submitted,

Michael J. Painter
Coordinator

=-=-=-

ELLEN KARNOWSKI <nature1194@hotmail.com>

10/18/2010 09:20 PM

To <ukiahwindeis@ca.blm.gov>
cc

Subject FW: Proposed Walker Ridge wind energy project comments

Ellen Karnowski
707-591-6708

From: nature1194@hotmail.com
To: nature1194@hotmail.com
Subject: RE: Proposed Walker Ridge wind energy project comments
Date: Mon, 18 Oct 2010 06:39:04 -0700

To Mr. Richard Burns
BLM Field Office
Ukiah, Ca 95482

Dear Mr. Burns:

I have some further comments on the wind farm planned for Walker Ridge.
This project will be helpful to big out of state developers, but there are not any local benefits. It will lead to road development and decimation of wildlife. I am concerned in regards to these effects.
I also believe that wind energy is more expensive than conventional, in that it requires a production tax credit to achieve its economy of scale. It is not worth the cost to our environment. It is unpredictable and must be backed up by conventional generation, leading to higher rates. Also, large turbines require expensive upgrades and have power quality issues. These are ongoing concerns which will worsen over time. The large turbines also are noisy and have serious environmental impacts, especially along a flyway route.
Yesterday I drove to San Francisco during a rainstorm. I saw areas where large white pelicans were looking for shelter from the storm along Hwy. 101. It was a small spit of land they had to rest on. The land these birds have access to is becoming more and more scarce. We really don't need to be endangering them further.

Thanks for reading my concerns in this letter. Let me know if you would like me to mail a hard copy and I will.

Respectfully Submitted,

Ellen Karnowski
707-591-6708

From: nature1194@hotmail.com

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"Craig Thomsen" <cdthomsen@ucdavis.edu>

10/19/2010 02:35 PM

To ukiahwindeis@ca.blm.gov

cc

Subject EIS scoping comments

Dear Rich and Ashley,

Attached are my comments regarding the Wind Energy Facility EIS
for Walker Ridge. I would appreciate receiving a confirmation that this
was
received.

Thank you,
Craig Thomsen

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Greg Suba <gsuba@cnps.org>

10/22/2010 02:17 PM

To ukiahwindeis@ca.blm.gov, Richard_Burns@ca.blm.gov
cc ashley_conrad-shydah@ca.blm.gov
Subject CNPS Walker Ridge DEIS Scoping Comments

Dear Mr. Burns,
Please accept and fully consider these comments submitted on behalf of The California Native Plant Society regarding the development of a draft Environmental Impact Statement (DEIS) for the AltaGas Renewable Energy Pacific, Inc.'s (AltaGas's) proposed Walker Ridge Wind Project (CACA-49639). A hardcopy has been mailed to your office today, Friday October 22nd.

Sincerely,
Greg Suba
Conservation Program Director
California Native Plant Society
2707 K Street, Suite 1
Sacramento, CA 95816
916-447-2677 x-206

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"Bob Schneider" <verve2006@comcast.net>

10/22/2010 10:28 AM

To <ukiahwindeis@ca.blm.gov>

cc <Richard_Burns@blm.gov>, <Ashley_Conrad-Saydah@blm.gov>, "Kathy Hardy" <kathryn_hardy@blm.gov>

Subject FW: Walker Ridge Wind Development scoping comments

(We will send the powerpoint as a separate email)
Folks,
Please find attached Tuleyome's Walker Ridge Wind Development project scoping comments. Also attached for inclusion in the record are our letters to Rich Burns Dec 22, 2009 and Jan 2, 2010; and Kathy Hardy on Feb 18, 2010. We have also attached for inclusion in the record the power point that we had hoped to present at the October 8, 2010 Sacramento scoping meeting to illustrate some of our concerns.

Please ensure that Tuleyome is noticed on all communications with respect to this project.

And, as we have requested before, we would like to be informed of and be provided with copies of all mail, email, phone and meeting notes or other communications concerning this project.

Bob Schneider

Bob Schneider
Senior Policy Director
Tuleyome
607 North Street
Woodland, CA 95616
www.tuleyome.org
530-304-6215
bschneider@tuleyome.org
or
Verve Enterprises
2402 Westernesse Rd
Davis, CA 95616
530-304-6215
verve2006@comcast.net

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"Jim Robison" <jim_robison@comcast.net>

11/01/2010 09:48 AM

To <ukiahwindeis@ca.blm.gov>

cc

Subject Walker Ridge Service Roads

Ms. Lefebvru,

Please add my email address to your Walker Ridge mailing list.

Once the Walker Ridge wind project is completed, could the service roads be used, with appropriate permits, for an OHV event?

Thank you,
Jim Robison

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Letters

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Alice Bond
<alice_bond@tws.org>
08/17/2010 10:54 AM

To "Tom_Pogacnik@ca.blm.gov" <Tom_Pogacnik@ca.blm.gov>, "Richard_Burns@ca.blm.gov" <Richard_Burns@ca.blm.gov>
cc "Director@blm.gov" <Director@blm.gov>, "Steve_Black@ios.doi.gov" <Steve_Black@ios.doi.gov>, "jim_abbott@ca.blm.gov" <jim_abbott@ca.blm.gov>,
bcc

Subject Walker Ridge Wind Project Scoping Extension Request

Greetings,

Please find the attached letter requesting an extension of the scoping period for the proposed Walker Ridge Wind Project on behalf of The Wilderness Society, Natural Resources Defense Council, Defenders of Wildlife, Center for Biological Diversity, California Native Plant Society, California Wilderness Coalition, and Tuleyome.

We look forward to your prompt response to this time-sensitive matter. Please contact me with any questions.

Thank you,

Alice Bond
The Wilderness Society
California/Nevada Office
655 Montgomery Street, Suite 1000
San Francisco, CA 94111
O: 415-398-1111 ext. 103
C: 415-517-3176

Final Walker Ridge Scoping Extension Request.pdf ACEC_Nomination_John_Hunter.doc

August 17, 2010

Via email and U.S. Mail

Thomas Pogacnik, Deputy State Director
Rich Burns, Ukiah Field Office Manager
Bureau of Land Management
2800 Cottage Way
Sacramento, CA 95825-1886

Re: Request for Extension of Comment Period for Scoping Period to Prepare an Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Mr. Pogacnik and Mr. Burns,

The Wilderness Society, Natural Resources Defense Council, Defenders of Wildlife, Center for Biological Diversity, California Native Plant Society, California Wilderness Coalition, and Tuleyome, on behalf of our millions of members and supporters nationwide, requests an extension of the public scoping comment period to at least 90 days for AltaGas Renewable Energy Pacific, Inc.'s proposed Walker Ridge Wind Project (CACA-49639). Our organizations are all environmental membership organizations with a long history of advocacy on behalf of the lands and resources administered by the BLM. While we support the development of alternative energy sources as an essential part of our nation's energy supply, the Walker Ridge area contains outstanding biological, ecological, geological, scenic, and wilderness qualities. From the information that has already been gathered regarding the environmental resources that could be significantly adversely impacted, it appears that this area is likely inappropriate for wind development. Given the significant resource and conservation values of the area and the strong level of public concern regarding this proposed

project, we request at least a 90-day comment period in order for the public to adequately prepare comments on what will be a complicated analysis of potential impacts from the proposed wind project to an area of high conservation values.

The proposed AltaGas Walker Ridge Wind Project will potentially have significant impacts to the area's biological resources, water resources from mercury contamination, wilderness characteristics, and the overall conservation values of the region. This region includes public land bordered by Bear Valley to the east and Indian Valley Reservoir to the west. Due to the complexity of the potential impacts to these important resources, a longer time period is warranted for the public to submit comments on the proposed project. In addition, more time is crucial in order to recruit independent expert comments from scientific researchers and others on the important resources in this area.

Biological resources

Walker Ridge hosts up to 23 special-status, serpentine-associated plant species, more than 50 serpentine endemic plants, and many unusual plant communities. To protect the unique botanical values and rare plants found there, the California Native Plant Society (CNPS) submitted a proposal in October 2005 to the BLM that recommended the creation of an Area of Critical Environmental Concern (ACEC) encompassing the entire Walker Ridge area (see Attachment A). However, the flora of Walker Ridge is still not adequately known and occurrence data for special-status species in this region are incomplete. In addition, the Walker Ridge fire in June 2008 released a profusion of herbaceous plants, some of which are only rarely observed from the area. Moreover, botanists who have visited the area after the fire have noted dramatic year to year (2009, 2010) differences in the floristic composition of burned areas, indicating the need for longer-term surveys to better document the flora in the proposed project area.

The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

There are potentially significant impacts to migratory birds and bats from the proposed Walker Ridge wind farm. A study by Erickson et al. (2001, 2003) found that of all avian fatalities, passerines comprise 78%, much greater than waterfowl at 6%, raptors at 3%, and shorebirds at 2%. According to a terrestrial bird expert with the Point Reyes Bird Observatory, Walker Ridge may be a critical for migrating passerines, based on its general geographic location to the Yolla Bolly Mountains, where research has shown that in September and early October, up-mountain migrants disappear and are replaced by long-distance migrants. The major influx of this period comes from Audubon's Yellow-rumped Warblers, but small numbers of many other species and races occur. These include: Orange-crowned (possibly several races), Yellow, Myrtle Yellow-rumped, Hermit, Black-throated Gray, and Townsend's warblers. Northern races of Orange-crowned Warbler, Myrtle Yellow-rumped Warbler, and Townsend's Warbler can be definitely assigned to the long distance migrant category. This indicates that this region might be highly productive at this time of year and a good place for preparing for long distance migrations (Greenberg 1974).

Five relatively rare butterflies are found at Walker Ridge: *Zerene eurydice* (California Dogface, the California state insect), *Papilio indra, Euphydryas editha, Mitoura muiri, Mitoura spinetorum,* and *Mitoura johnsoni.* Butterflies are of particular concern because many species, including several of the above, use aggregation on hilltops as an essential part of the mate-finding process. Detailed multi-year observations would be needed to know which hilltops are critical to which species. In fact, local

experts have observed that in the Knoxville Wildlife Area (managed by California Department of Fish and Game), when small wind "test towers" were installed, butterflies were harmed both by the site footprint itself and by road widening, and no biological surveys were done to assess impacts. Windows of observation for insects are brief and approximate depending on the particular year's weather patterns.

In addition, the nearby Bear Creek corridor is a biological hotspot for dragonflies and damselflies, supporting nearly 50% of the known species in California. Two rare species known from the vicinity are *Ischnura barberi* (Desert Forktail), a disjunct population of a damselfly normally found in Southern California; and *Anax Walshinghami* (Giant Darner), the largest dragonfly found in North America, and again a disjunct population of a Southern California species.

The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies is a critical question that needs review and input by the scientific community. Again, the 30-day proposed public scoping period is insufficient to address the complexity of this issue.

Walker Ridge should be classified as a Category 3 site--having high or uncertain potential for wildlife impacts under the California Energy Commission's California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development. This status calls for more than one year of pre-permitting studies, given what is known about year-to-year variation in many plant and animal populations in this region. At a minimum, two years of pre-permitting study would provide a stronger and much needed baseline for future operations monitoring and impact assessment.

Mercury Contamination of Water Resources

The presence of mercury (and chromium) in serpentine rocks and soils (USGS reports) on Walker Ridge and elsewhere in the area constitute a potential public health hazard, should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development, road grading and digging for guy line supports could mobilize mercury-laden soils, as well as increase sedimentation—the primary route of mercury discharges—into nearby water bodies. For example, Sulphur Creek, which drains a portion of Walker Ridge on the east side and flows through the Sulphur Creek Mining District, has a Total Maximum Daily Load (TMDL) for mercury. Sulphur Creek is a major tributary of Bear Creek which has a TMDL for methylmercury. These two drainages are part of the Upper Cache (Bear Creek) watershed. Cache Creek is the largest contributor of mercury contamination for the San Francisco Bay Delta ecosystem, providing an estimated 50% of the total mercury load. Also noteworthy (albeit removed from the immediate proposed project area) is the Rathburn-Petry mine that occurs on Walker Ridge just above Bear Valley, now undergoing major cleanup operations for mercury remediation. The potential for increased sedimentation and mercury discharges are a significant environmental risk that must be properly studied and characterized by a trusted independent entity such as the USGS prior to any authorization of actions that will mobilize sediments.

Indian Valley Reservoir, located directly down slope from the proposed development site, was listed in 2009 under Clean Water Act Section 303(d) for mercury impairment. A TMDL plan must be prepared for the Reservoir. Certification is required from the Central Valley Regional Water Board that additional activities on Walker Ridge can be conducted in ways consistent with California water quality laws, and with the Regional Board's TMDL, prior to the Bureau's authorization of actions

that will exacerbate potential mercury releases prior to any significant soil disturbance activities that may result in further impairment.

Wilderness Characteristics

The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness designation must be assessed prior to any irrevocable commitments.[1]

Any land with potential wilderness characteristics must be inventoried as part of the environmental review for any renewable energy or transmission projects. Again, the 30-day proposed public scoping period is insufficient to address the complexity of potential impacts to lands with wilderness characteristics. More time is needed for the public to review potential impacts to these lands to adequately identify the potential issues with this proposal and examine potential alternatives.

Regional Conservation Values

Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1,500,000 was made to purchase a conservation easement there to protect the scenic, conservation, and working landscape values in perpetuity. In addition, the Walker Ridge area is located within the Berryessa Snow Mountain region. Environmental groups, agencies, local communities, and legislators have come together to support designating the Berryessa Snow Mountain region as a National Conservation Area for future generations to enjoy. Furthermore, a Department of Interior memo entitled "Prospective Conservation Designation: National Monument Designations under the Antiquities Act" lists the Berryessa Snow Mountain region as one of the "nationally significant landscapes . . . worthy of inclusion in the NLCS [National Landscape Conservation System]." The memo states that the areas listed "may be good candidates for National Monument designation under the Antiquities Act."

Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change, while preserving the wildlife and lands we enjoy today. The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature.

Concerns for the potential impacts to these resources require more time to gather and submit information to the BLM on how these areas could be impacted and to suggest appropriate alternatives.

Conclusion

Given the complicated natural resource issues in the Walker Ridge area, the significant public interest in the biological resources, wilderness characteristics, and conservation values of this area, and the significant potential resource conflicts from the proposed project at this location, an extended public comment period is both warranted and needed. NEPA requires BLM to support public participation and specifically to "make diligent efforts to involve the public in preparing and

[1] Citizens' Proposed Wilderness areas have been inventoried by various citizens groups, conservationists, and agencies and found to have "wilderness characteristics," including naturalness, solitude and the opportunity for primitive recreation. These lands also provide important wildlife habitat, cultural and scientific resources, invaluable ecosystem services including clean air and water, important economic benefits, and many other resources and values. Though they do not represent all lands with wilderness characteristics in the West, the lands are the most current representation of lands identified by the responsible groups to-date. Development in Citizens' Proposed Wilderness areas would be ecologically irresponsible and would lead to high levels of conflict.

implementing their NEPA procedures." 40 C.F.R. § 1606.6(a). Extending the public comment period would ensure full and adequate public participation in this part of the NEPA process, in which BLM is seeking to make decisions with far-reaching implications for the Walker Ridge area and the larger Berryessa Snow Mountain region.

We look forward to your prompt response to this time-sensitive matter. Should you have any questions, please feel free to contact Alice Bond at 415-398-1111, ext. 103 or alice_bond@tws.org.

Sincerely,

Alice Bond
The Wilderness Society
655 Montgomery Street, Suite 1000
San Francisco, CA 94111

Johanna Wald
Natural Resources Defense Council

Kim Delfino
Defenders of Wildlife

Lisa Belenky
Center for Biological Diversity

Tara Hansen
California Native Plant Society

Ryan Henson
California Wilderness Coalition

Bob Schneider
Tuleyome

cc: Robert Abbey, Director, Bureau of Land Management
cc: Jim Abbott, Acting California State Director, Bureau of Land Management
cc: Steve Black, Counselor to the Secretary, U.S. Department of the Interior
cc: Kathy Hardy, District Manager for Central California, Bureau of Land Management
cc: Ashley Conrad-Saydah, Renewable Energy Project Manager, Bureau of Land Management
cc: Scott Flint, Climate Change/Renewable Energy Branch, CA Department of Fish and Game

From:	"Bob Schneider" <verve2006@comcast.net>
Recipients:	<Richard_Burns@blm.gov>, "Kathy Hardy" <kathryn_hardy@blm.gov>, <Ashley_Conrad-Saydah@blm.gov>
Subject:	scoping mtg notice and request for Sac scoping mtg
Date:	09/08/2010 07:19:49 PM

Hello Rich, Kathy and Ashley,
Please find attached our letter with respect to our concerns on the lack of public communication and notice on the Walker Ridge scoping meetings and out official request for a scoping meeting in Sacramento.

We would like to reiterate once again that Tuleyome formally request notification of all meetings, letters, reports, email communications, telephone calls and other media with respect to the proposed Walker Ridge wind development project by Alta Gas.

Thank you.

cheers,
Bob Schneider
Senior Policy Director
Tuleyome
607 North Street
Woodland, CA 95695
530-304-6215

bschneider@tuleyome.org Burns ltr communication and sac scoping mtg 9 8 10 final.pdf

Tuleyome
DEEP HOME PLACE
We Dream, We Act, We Get Things Done

Protecting the wild and agricultural heritage of the Northern Inner Coast Range and the Western Sacramento Valley for existing and future generations.

September 8, 2010

Rich Burns
Ukiah Field Office CA-340
Bureau of Land Management
Ukiah Field Office
2550 North State Street
Ukiah, CA 95482
(707) 468-4070
Richard_Burns@ca.blm.gov

Kathy Hardy
District Manager- Central CA
BLM
2800 Cottage Way, W-1623
Sacramento, CA 95825
kathryn_hardy@blm.gov

Re: Communication Concerns and Need for Sacramento Scoping Meeting

Dear Mr. Burns and Ms Hardy:

We are writing about our concerns and interests in rectifying poor communications with respect to the proposed Walker Ridge wind development project, particularly as it relates to the currently planned scoping meeting dates. **We also officially request a third scoping meeting, which we request to be held in Sacramento.**

We very much appreciate the informal "heads up" email communication from Rich Burns that indicated that the Walker Ridge scoping meetings would likely by held September 9 in Colusa and September 10 in Lakeport. This heads-up did not have the final meeting locations and the eventual date and city was reversed. We received no additional formal communication from the BLM indicating the dates and actual locations although we understand that a press release was prepared and posted on the web on August 23.

However, the scoping meeting dates are buried in the BLM web site. To find the relevant information one must navigate through the Walker Ridge Wind Energy Proposal Information page and the News Release regarding Public Meetings for the Walker Ridge Wind Project page, and then find the key information about meeting dates, locations and times, located at the bottom of the press release . We request that the BLM make such important information much more visible on the page that addresses the proposed project.

It is important to point out that this is the only place where the correct locations were stated. This information is important in the process of interacting with the BLM about this proposal, and it must be made more easily accessible for the concerned public. In addition, the press release was first printed on September 3 in the Lake County News. It hardly seems necessary to point out that less than one week is hardly adequate notice.

While we understand that the BLM cannot be responsible for when (or if) newspapers print press releases, it is the BLM's responsibility to ensure that adequate public notice is given for major actions affecting the public's lands.

At a minimum we suggest:

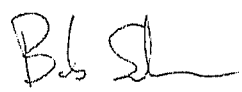
1. All notices for required BLM actions need to be prominently displayed on BLM webpages, with critical milestones clearly emphasized for public engagement.
2. Individual notice should be given to all individuals and organizations that have expressed interest in this project *particularly those who have on several occasions requested in writing to be so informed.*
3. Paid notices should be sent to newspapers throughout the affected region. In this case this should at a minimum include the Santa Rosa *Press Democrat*, Lake County papers, Colusa County papers, and the *Sacramento Bee.*

These steps were not taken and as a result affected stakeholders will miss these scoping meetings.

The Walker Ridge wind proposal has statewide and national significance for energy security and for environmental resources of concern. The locations of these scoping meetings fail to accommodate this widespread interest – holding only local scoping meetings does not recognize the statewide and national concerns of those affected by the project.

To help rectify this deficiency Tuleyome officially requests that the BLM hold an additional scoping meeting in Sacramento. If the meeting is held with less than two weeks until the comment deadline then we also request that the comment deadline be extended.

Sincerely,



Bob Schneider
Senior Policy Director
530-304-6215
bschneider@tuleyome.org

Cc: Ashley Conrad-Saydah, Renewable Energy Project Manager, BLM

Richard Burns/CASO/CA/BLM/DOI
08/13/2010 09:41 AM

To "Bob Schneider" <verve2006@comcast.net>, vbrandon@lakelive.org
cc
bcc
Subject RE: Walker Ridge NOI

Hi Bob and Victoria,

FYI, the NOI for Walker Ridge was released by the Washington Office today. It's going to say 30 day public scoping because according to the Washington Office that's SOP and they are not going to want to set prescient for future press releases. I do have the option of extending it. Just got off the phone with AltaGas and E&E about the Scoping meetings. Based on People and availability, it's looking like September 9 and 10 with the locations still being Clearlake and Williams and times from 6 until 9 pm. Bob, I hope you're doing well. Take care and have a great weekend. Press releases will follow.

Rich

UKIAH FIELD OFFICE
RECEIVED
SEP 15 2010
BUREAU OF LAND MANAGEMENT
UKIAH, CA

Geri Hulse-Stephens
President
Sanhedrin Chapter
California Native Plant Society
915 East Hill Rd.
Willits, CA 95490

September 9, 2010

Bethney Lefebvre
Bureau of Land Management
US Dept. of the Interior
Ukiah Field Office
2550 North State St.
Ukiah, Calif., 95482

I am writing you as president of the Lake and Mendocino County chapter of the California Native Plant Society (CNPS), concerning the Walker Ridge Wind Project.

While CNPS supports the development of renewable energy in California, clean energy projects are all too often proposed without adequate concern for the impact to sensitive natural communities and species. The Walker Ridge Wind Project is one such project.

Walker Ridge is a sensitive natural area. A substantial component of the plant diversity of the area is associated with serpentine-derived soils which give rise to many uncommon and rare species. Seven rare taxa (CNPS List 1B) are known to occur in the proposed project area. Incompatible management of the area would contribute to further declines of these rare species and the sensitive natural community.

Walker Ridge has been nominated by CNPS as an Area of Critical Environmental Concern (ACEC) based on the sensitive plant occurrences and natural community. In the 2006 BLM Ukiah District Resource Management Plan and FEIR, BLM responded to this nomination by saying "BLM will develop a Walker Ridge ACEC activity plan that will provide more specific management for the ACEC. Your detailed proposal will be further addressed during development of said activity plan."
Our questions to you are these:

1. Has the Walker Ridge ACEC activity plan been developed?
2. If so, where can it be accessed? If not, when will it be completed?

3. How will the Walker Ridge ACEC activity plan address project construction? Operation? Decommissioning?
4. Is an ACEC Activity Plan the same as an ACEC Implementation Plan?

It is apparent that the Walker Ridge area is not an appropriate site for wind development because of the sensitive biological resources that could be significantly adversely impacted by this project. Due to the presence of strong public opinion about this project and its statewide significance in regard to both energy security and environmental resource protection we urge you to hold an additional scoping meeting in Sacramento and to extend the public comment period to at least 90 days in order for the public to adequately address the issues.

Sincerely yours,

Geri Hulse-Stephens

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

SEP 13 2010

ATTN: Rich Burns
Bureau of Land Management
Ukiah Field Office
2550 North State Street,
Ukiah, California 95482

Subject: Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Walker Ridge Wind Project, Lake and Colusa Counties, California

Dear Mr. Burns:

The U.S. Environmental Protection Agency (EPA) has reviewed the August 13, 2010, Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for the Proposed Walker Ridge Wind Project, Lake and Colusa Counties, California. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA supports increasing the development of renewable energy resources, as recommended in the National Energy Policy Act of 2005. Using renewable energy resources such as wind power can help the nation meet its energy requirements while reducing greenhouse gas emissions. To assist in the scoping process for this project, we have identified several issues for your attention in the preparation of the EIS. We are most concerned about impacts to water resources, biological resources, and habitat, as well as cumulative impacts associated with the potential development of multiple large-scale wind and solar projects.

We appreciate the opportunity to review this NOI and are available to discuss our comments. Please send two hard copy of the Draft EIS and two CD ROM copies to this office at the same time it is officially filed with our Washington D.C. Office. If you have any questions, please contact me at (415) 942-3545 or at mcpherson.ann@epa.gov.

Sincerely,

Ann McPherson
Environmental Review Office

Enclosures: EPA's Detailed Comments

US EPA DETAILED COMMENTS ON THE NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED STATEMENT FOR THE PROPOSED WALKER RIDGE WIND PROJECT, LAKE AND COLUSA COUNTIES, CALIFORNIA, SEPTEMBER 13, 2010

Project Description

AltaGas Renewable Energy Pacific, Inc., (AltaGas) has requested a right-of-way (ROW) (CACA-49639) to construct, operate, maintain, and decommission a 67 megawatt (MW) wind energy project with an interconnection to the Pacific Gas and Electric 115-kilovolt (kV) distribution system. The proposed action will include up to 42 wind turbine generators, an underground electrical collection system, a substation, a 115-kV overhead transmission line, an interconnect station, an operations and maintenance building, access roads, and a temporary laydown area. The project site is about 10 miles south of the Mendocino National Forest and directly east of Indian Valley reservoir. The project will be located in the unincorporated areas of Lake and Colusa counties in California within the 8,157.35 acre ROW on Federal land under the jurisdiction of the Bureau of Land Management (BLM). No private land will be impacted by the project.

AltaGas intends to use 2.3 MW Siemens Wind Turbine Generators (WTGs) to produce the desired 60 to 70 MW output. Walker Ridge Road would be used as the primary access road during construction and operation. To the greatest extent feasible, proposed WTGs would be located in pre-disturbed land adjacent to Walker Ridge Road and in fire breaks constructed by CalFire to minimize environmental impacts. The project will use lands near an existing transmission line and would not require the construction of new utility corridors outside of the proposed project ROW.

Statement of Purpose and Need

The Draft Environmental Impact Statement (DEIS) should clearly identify the underlying purpose and need to which BLM is responding in proposing the alternatives (40 CFR 1502.13). The *purpose* of the proposed action is typically the specific objectives of the activity, while the *need* for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity.

> *Recommendation:*
> The purpose and need should be a clear, objective statement of the rationale for the proposed project. The DEIS should discuss the proposed project in the context of the larger energy market that this project would serve; identify potential purchasers of the power produced; and discuss how the project will assist the state in meeting its renewable energy portfolio standards and goals.

Alternatives Analysis

NEPA requires evaluation of reasonable alternatives, including those that may not be within the jurisdiction of the lead agency (40 CFR Section 1502.14(c)). A robust range of

alternatives will include options for avoiding significant environmental impacts. The DEIS should provide a clear discussion of the reasons for the elimination of alternatives which are not evaluated in detail. Reasonable alternatives should include, but are not necessarily limited to, alternative sites, capacities, and technologies as well as alternatives that identify environmentally sensitive areas or areas with potential use conflicts. The alternatives analysis should describe the approach used to identify environmentally sensitive areas and describe the process that was used to designate them in terms of sensitivity (low, medium, and high).

The environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public (40 CFR 1502.14). The potential environmental impacts of each alternative should be quantified to the greatest extent possible (e.g., acres of wetlands impacted, tons per year of emissions produced, etc.).

Recommendations:
The DEIS should describe how each alternative was developed, how it addresses each project objective, and how it would be implemented. The alternatives analysis should include a discussion of locations, including on-site alternatives that demonstrate reducing impacts, as well as different generating technologies. The DEIS should describe the benefits associated with the proposed technology.

The DEIS should clearly describe the rationale used to determine whether impacts of an alternative are significant or not. Thresholds of significance should be determined by considering the context and intensity of an action and its effects (40 CFR 1508.27).

Water Resources

Clean Water Act Section 303(d)

The Clean Water Act (CWA) requires States to develop a list of impaired waters that do not meet water quality standards, establish priority rankings, and develop action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality.

Recommendation:
The DEIS should provide information on CWA Section 303(d) impaired waters in the project area, if any, and efforts to develop and revise TMDLs. The DEIS should describe existing restoration and enhancement efforts for those waters, how the proposed project will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of impaired waters.

Clean Water Act Section 404

The project applicant should coordinate with the U.S. Army Corps of Engineers (Corps) to determine if the proposed project requires a Section 404 permit under the Clean Water Act (CWA). Section 404 regulates the discharge of dredged or fill material into waters of the United

States (WOUS), including wetlands and other *special aquatic sites*. The DEIS should describe all WOUS that could be affected by the project alternatives, and include maps that clearly identify all waters within the project area. The discussion should include acreages and channel lengths, habitat types, values, and functions of these waters. In addition, EPA suggests that BLM include a jurisdictional delineation for all WOUS, including ephemeral drainages, in accordance with the 1987 *Corps of Engineers Wetlands Delineation Manual* and the December 2006 *Arid West Region Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region*. A jurisdictional delineation will confirm the presence of WOUS in the project area and help determine impact avoidance or if state and federal permits would be required for activities that affect WOUS.

If a permit is required, EPA will review the project for compliance with *Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials* (40 CFR 230), promulgated pursuant to Section 404(b)(1) of the CWA ("404(b)(1) Guidelines"). Pursuant to 40CFR 230, any permitted discharge into WOUS must be the least environmentally damaging practicable alternative (LEDPA) available to achieve the project purpose. The DEIS should include an evaluation of the project alternatives in this context in order to demonstrate the project's compliance with the 404(b)(1) Guidelines. If, under the proposed project, dredged or fill material would be discharged into WOUS, the DEIS should discuss alternatives to avoid those discharges.

The DEIS should describe the original (natural) drainage patterns in the project locale, as well as the drainage patterns of the area during project operations, and identify whether any components of the proposed project are within a 50 or 100-year floodplain. We also recommend the DEIS include information on the functions and locations of WOUS and their direct relationship to waters downstream.

Recommendations:
The applicant should coordinate with the U.S. Army Corps of Engineers to obtain a jurisdictional delineation and determine whether or not a CWA Section 404 permit would be needed. If a permit is needed, the DEIS should demonstrate the project's compliance with the CWA 404(b)(1) Guidelines.

The DEIS should describe any waters of the U.S. and the drainage patterns at the project location.

Water Supplies

Public drinking water supplies and/or their source areas often exist in many watersheds. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source water areas are delineated and mapped by the state for each federally-regulated public water system. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. Therefore, EPA recommends that the EIS identify:

a) source water protection areas within the project area;

b) activities that could potentially affect source water areas;
c) potential contaminants that may result from the proposed project; and
d) measures that would be taken to protect the source water protection areas.

Large turbines require substantial foundations and associated structural and geotechnical engineering considerations. The substantial amount of concrete typically used in foundations for large wind turbines requires a large amount of cement, sand, and aggregate. A typical 1.5 MW WTG can require up to 6500 gallons of water for each turbine foundation mixture.

Recommendation:
The DEIS should describe whether a temporary batch plant will be installed on site for the needed concrete, estimate the quantity of water required for the concrete mixture and describe the source of this water and potential effects on other water users and natural resources in the project area.

Biological Resources, Habitat and Wildlife

During construction of the proposed project, vegetation would be cleared and soils moved during the construction of roads, wind turbine foundations, substation, switchyard, and other facilities. The DEIS should describe the current quality and capacity of habitat and its use by wildlife in the proposed project area, especially bats and avian populations. The DEIS should describe the critical habitat for the species; identify any impacts the proposed project will have on the species and their critical habitats; and how the proposed project will meet all requirements under the Endangered Species Act, including consultation with the U.S. Fish and Wildlife Service and California Department of Fish and Game.

Wind energy generation projects have the potential to disrupt important wildlife species habitat, resulting in mortality of migratory species such as birds and bats due to collisions with rotors. The EIS should consider whether migratory birds are likely to use the project area and avoid, if possible: 1) areas supporting a high density of wintering or migratory birds, 2) areas with high level of raptor activity, and 3) breeding, wintering or migrating populations of less abundant species which may be sensitive to increased mortality as a result of collision.

A comprehensive monitoring program should be designed to evaluate impacts on bats and avian species. We suggest that the BLM conduct pre-construction baseline surveys to evaluate the site for its importance to bats and avian species, as well as post-construction surveys to determine the extent of mortalities and to determine the effectiveness of mitigation measures. Surveys should be conducted by a qualified biologist during the appropriate time of year. BLM actions should promote the recovery of declining populations of species. Collision risk depends on a range of factors related to species, numbers and behavior, weather conditions, topography, and lighting. The DEIS should identify and describe specific turbine types and their operating characteristics and consider turbine design standards that minimize adverse impacts to wildlife, particularly birds and bats. Consideration should be given to reducing the perching and nesting opportunities, which may help reduce potential collisions.

The DEIS should identify all petitioned and listed threatened and endangered species that might occur within the project area. The DEIS should identify and quantify which species might be directly or indirectly affected by each alternative. All raptor and owl species are protected under the Migratory Bird Treaty Act (MBTA). The golden eagle and bald eagle also receive protection under the Bald and Golden Eagle Protection Act (BGEPA). The MBTA, however, has no provision for allowing unauthorized take. In September 2009, the FWS finalized permit regulations[1] under the BGEPA for the take of bald and golden eagles on a limited basis, provided that the take is compatible with preservation of the eagle and cannot be practicably avoided. The final rule states that if advanced conservation practices (ACPs) can be developed to significantly reduce take, the operator of a wind-power facility may qualify for a programmatic take permit. Most permits under the new regulations would authorize *disturbance,* rather than take.

Recommendations:
Identify specific measures to reduce impacts to eagles and clarify how the proposed project will comply with the MBTA and BGEPA.

Discuss the applicability of the recently finalized FWS permit regulations (50 CFR parts 13 and 22) to the proposed project. Elaborate on process and/or likelihood of obtaining a permit via these regulations.

Commit to additional data collection/analysis to identify areas that are important to bald and golden eagles to ensure proper siting and avoid take of these species.

If alternatives cannot be developed that avoid the take of eagles, develop an operational monitoring and adaptive management plan to address this issue.

BLM Areas of Critical Environmental Concern (ACEC) are managed for the protection of specific sensitive resources or habitats. The project site is located adjacent to two units of the Indian Valley ACEC. Walker Ridge Road bisects a part of the ACEC just north of Highway 20 within the project site. This ACEC has been established for the protection of special status plants. The region surrounding Walker Ridge contains a diverse ecological community including serpentine chaparral, grasslands, oak woodlands, and endemic species. Because the project may have impacts on native and rare plants, the DEIS should include general locations of rare plants, and how these sites will be managed to minimize impacts on the plants. If any pesticides and herbicides will be used for vegetation treatment during the proposed project operations, the DEIS should address any potential toxic hazards related to the application of the chemicals, and describe what actions will be taken to assure that impacts by toxic substances released to the environment will be minimized. If vegetation would be burned, then the DEIS should include a smoke management program that would be followed to reduce public health impacts and potential ambient air quality exceedances.

[1] See Eagle Permits, 50 CFR parts 13 and 22, issued Sept. 11, 2009. See internet address: http://www.fws.gov/migratorybirds/CurrentBirdIssues/BaldEagle/Final%20Disturbance%20Rule%209%20Sept%202009.pdf

Recommendation:
A comprehensive monitoring program should be designed to evaluate impacts on bats and avian species, and the DEIS should discuss design and management measures to minimize adverse impacts to wildlife and native and rare plants.

Invasive Species

Executive Order 13112, *Invasive Species* (February 3, 1999), mandates that federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species cause. Executive Order 13112 also calls for the restoration of native plants and tree species. If the proposed project will entail new landscaping, the DEIS should describe how the project will meet the requirements of Executive Order 13112.

Recommendation:
The DEIS should include an invasive plant management plan to monitor and control noxious weeds.

Indirect and Cumulative Impacts

The cumulative impacts analysis should provide the context for understanding the magnitude of the impacts of the alternatives by analyzing the impacts of other past, present, and reasonably foreseeable projects or actions and then considering those cumulative impacts in their entirety (CEQ's Forty Questions, #18). The DEIS should clearly identify the resources that may be cumulatively impacted, the time over which impacts are going to occur, and the geographic area that will be impacted by the proposed project. The DEIS should focus on resources of concern – those resources that are "at risk" and/or are significantly impacted by the proposed project, before mitigation. In the introduction to the *Cumulative Impacts Section*, identify which resources are analyzed, which ones are not, and why. For each resource analyzed, the DEIS should:

- Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date.
- Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis.
- Identify all on-going, planned, and reasonably foreseeable projects in the study area that may contribute to cumulative impacts.
- Identify the future condition of the resource based on an analysis of impacts from reasonably foreseeable projects or actions added to existing conditions and current trends.
- Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives.
- Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.
- Identify opportunities to avoid and minimize impacts, including working with other entities.

As an indirect result of providing additional power, it can be anticipated that this project will allow for development and population growth to occur in those areas that receive the generated electricity.

Recommendations:
The DEIS should describe the reasonably foreseeable future land use and associated impacts that will result from the additional power supply. The document should provide an estimate of the amount of growth, its likely location, and the biological and environmental resources at risk.

The DEIS should consider the direct and indirect effects of the inter-connecting transmission line for the proposed project, as well as the cumulative effects associated with the transmission needs of other reasonably foreseeable projects.

Implementation of Adaptive Management Techniques for Mitigation Measures

Adaptive management is an iterative process that requires selecting and implementing management actions, monitoring, comparing results with management and project objectives, and using feedback to make future management decisions. The process recognizes the importance of continually improving management techniques through flexibility and adaptation instead of adhering rigidly to a standard set of management actions. Although adaptive management is not a new concept, it may be relatively new in its application to specific projects. The effectiveness of adaptive management monitoring depends on a variety of factors including:

a) The ability to establish clear monitoring objectives;
b) Agreement on the impact thresholds being monitored;
c) The existence of a baseline or the ability to develop a baseline for the resources being monitored;
d) The ability to see the effects within an appropriate time frame after the action is taken;
e) The technical capabilities of the procedures and equipment used to identify and measure changes in the affected resources and the ability to analyze the changes;
f) The resources needed to perform the monitoring and respond to the results.

Recommendation:
EPA recommends that BLM consider adopting a formal adaptive management plan to evaluate and monitor impacted resources and ensure the successful implementation of mitigation measures. EPA recommends that BLM review the specific discussion on Adaptive Management in the NEPA Task Force Report to the Council on Environmental Quality (CEQ) on *Modernizing NEPA*.

Climate Change

Scientific evidence supports the concern that continued increases in greenhouse gas emissions resulting from human activities will contribute to climate change. Global warming is caused by emissions of carbon dioxide and other heat-trapping gases. Global warming can affect weather patterns, sea level, ocean acidification, chemical reaction rates, and precipitation rates, resulting in climate change. Reports also indicate that deserts may store as much carbon as temperate forests.

Recommendations:
The DEIS should consider how climate change could potentially influence the proposed project, specifically within sensitive areas, and assess how the projected impacts could be exacerbated by climate change.

The DEIS should consider the cumulative impacts associated with multiple large-scale wind and solar projects proposed in the desert southwest and clarify how existing and/or proposed resources will be affected by climate change.

The DEIS should quantify and disclose the anticipated climate change *benefits* of wind energy. We suggest quantifying greenhouse gas emissions from different types of generating facilities including solar, geothermal, natural gas, coal-burning, and nuclear and compiling and comparing these values.

Air Quality

The DEIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts). Such an evaluation is necessary to assure compliance with State and Federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality.

The DEIS should describe and estimate air emissions from the proposed facility, including potential construction and maintenance activities, as well as proposed mitigation measures to minimize those emissions. EPA recommends an evaluation of the following measures to reduce emissions of criteria air pollutants and hazardous air pollutants (air toxics).

Recommendations:

- *Existing Conditions* – The DEIS should provide a detailed discussion of ambient air conditions, NAAQS, and criteria pollutant nonattainment areas in all areas considered for wind development.

- *Quantify Emissions* – The DEIS should estimate emissions of criteria pollutants from the proposed project and discuss the timeframe for release of these emissions over the lifespan of the project. The DEIS should describe and estimate emissions from

potential construction activities, as well as proposed mitigation measures to minimize these emissions.

- *Specify Emission Sources* – The DEIS should specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention.

- *Equipment Emissions Mitigation Plan (EEMP)* – The DEIS should identify the need for an EEMP. An EEMP will identify actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and NOx associated with construction activities. We recommend that the EEMP require that all construction-related engines:

    - are tuned to the engine manufacturer's specification in accordance with an appropriate time frame;
    - do not idle for more than five minutes (unless, in the case of certain drilling engines, it is necessary for the operating scope);
    - are not tampered with in order to increase engine horsepower;
    - include particulate traps, oxidation catalysts and other suitable control devices on all construction equipment used at the project site;
    - use diesel fuel having a sulfur content of 15 parts per million or less, or other suitable alternative diesel fuel, unless such fuel cannot be reasonably procured in the market area; and
    - include control devices to reduce air emissions. The determination of which equipment is suitable for control devices should be made by an independent Licensed Mechanical Engineer. Equipment suitable for control devices may include drilling equipment, generators, compressors, graders, bulldozers, and dump trucks.

- *Fugitive Dust Control Plan* - The DEIS should identify the need for *Fugitive Dust Control Plan.* We recommend that it include these general recommendations:

    - Stabilize open storage piles and by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
    - Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions; and
    - When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

- The DEIS should contain an analysis of emissions from on site concrete production, including estimated mitigated annual emissions.

Naturally Occurring Asbestos

The Ultramafic rocks commonly found along the Walker Ridge area consist almost entirely of serpentinite. Disturbance of rocks and soils that contain naturally occurring asbestos (NOA), such as serpentine soils, can result in the release of asbestos fibers to the air and exposure to the public. Asbestos is a known human carcinogen and represents a potential human health risk for those exposed while using roads or trails where it occurs.

Recommendations:
EPA recommends that the BLM review the asbestos occurrence information on the California Geological Survey website: http://www.consrv.ca.gov/cgs/minerals/hazardous_minerals/asbestos/index.htm and the California Air Resources Board (CARB) regulations and guidance at: http://www.arb.ca.gov/toxics/asbestos/asbestos.htm. The CARB website addresses California's Asbestos Airborne Toxic Control Measures for surfacing Applications, which apply to unpaved roads.

EPA also recommends that the BLM review the recommendations presented in the Department of Toxic Substances Control report, "Study of Airborne Asbestos from a Serpentine Road in Garden Valley, California" at: http://www.dtsc.ca.gov/loader.cfm?url=/commonspot/security/getfile.cfm&pageid=33546.

The DEIS should identify and include commitments for measures that can be implemented to protect human health from NOA, and include this discussion in the DEIS.

Noise Impacts

The DEIS should include an assessment of noise levels from the wind turbines. Decibel levels of the turbines should be evaluated as should the effects of noise levels on a variety of species, as well as effects on property values, residences, and recreational use.

Visual Impacts

Careful attention should be given to how a wind turbine array is set against the landscape. Steps should be taken to minimize the visual impacts and make the wind turbines less obtrusive.

Coordination with Tribal Governments

The POD states that the project is located in the BLM's Indian Valley Management Area, which is part of the BLM's Ukiah FO. Cultural resources in the planning area range from early Native American habitation sites and activity areas to the remains of historic structures associated with mining, transportation, and ranching industries.

Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes.

Recommendation:
The DEIS should describe the process and outcome of government-to-government consultation between BLM and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative.

National Historic Preservation Act and Executive Order 13007

Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act (NHPA). Historic properties under the National Historic Preservation Act (NHPA) are properties that are included in the National Register of Historic Places (NRHP) or that meet the criteria for the National Register. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer (SHPO/THPO). Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated. Section 106 of the NHPA requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800.

Executive Order 13007, *Indian Sacred Sites* (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity of such sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site.

Recommendation:
The DEIS should address the existence of Indian sacred sites in the project area. It should address Executive Order 13007, distinguish it from Section 106 of the NHPA, and discuss how BLM will avoid adversely affecting the physical integrity of sacred sites, if they exist. The DEIS should provide a summary of all coordination with Tribes and with the SHPO/THPO, including identification of NRHP eligible sites, and development of a Cultural Resource Management Plan.

Environmental Justice

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994), directs federal agencies to identify and address disproportionately high and adverse human health or environmental effects on minority and low-income populations, allowing those populations a meaningful opportunity

to participate in the decision-making process. Guidance[2] by CEQ clarifies the terms low-income and minority population (which includes American Indians) and describes the factors to consider when evaluating disproportionately high and adverse human health effects.

> *Recommendation:*
> The DEIS should include an evaluation of environmental justice populations within the geographic scope of the project. If such populations exist, the DEIS should address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations. Assessment of the project's impact on minority and low-income populations should reflect coordination with those affected populations.

Hazardous Materials/Hazardous Waste/Solid Waste

The DEIS should address potential direct, indirect and cumulative impacts of hazardous waste from construction and operation of the proposed project. The document should identify projected hazardous waste types and volumes, and expected storage, disposal, and management plans. It should address the applicability of state and federal hazardous waste requirements. Appropriate mitigation should be evaluated, including measures to minimize the generation of hazardous waste (i.e., hazardous waste minimization). Alternate industrial processes using less toxic materials should be evaluated as mitigation. This potentially reduces the volume or toxicity of hazardous materials requiring management and disposal as hazardous waste.

Wind Turbine Production and Recycling

WTG production can address the full product life cycle, from raw material sourcing through end of life collection and reuse or recycling. Wind turbine companies can minimize their environmental impacts during raw material extraction and minimize the amount of rare materials used in the product. Collection and recycling can be facilitated through buy-back programs or collection and recycling guarantees. Some companies provide recycling programs that pay all packaging, transportation, and recycling costs.

> *Recommendation:*
> EPA recommends that the proponent strive to address the full product life cycle by sourcing wind turbine components from a company that: 1) minimizes environmental impacts during raw material extraction; 2) manufactures wind turbines in a zero waste facility; and 3) provides future disassembly for material recovery for reuse and recycling.

Project Decommissioning

On the average a lifespan of a wind park is 20-30 years. The life of the proposed wind project should be taken into consideration regarding decommissioning and reclamation.

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[2]Environmental Justice Guidance under the National Environmental Policy Act, Appendix A (Guidance for Federal Agencies on Key Terms in Executive Order 12898), CEQ, December 10, 1997.

Recommendation:
EPA recommends that the DEIS identify bonding or financial assurance strategies for decommissioning and reclamation.

Coordination with Land Use Planning Activities

The DEIS should discuss how the proposed action would support or conflict with the objectives of federal, state, tribal or local land use plans, policies and controls in the project area. The term "land use plans" includes all types of formally adopted documents for land use planning, conservation, zoning and related regulatory requirements. Proposed plans not yet developed should also be addressed it they have been formally proposed by the appropriate government body in a written form (CEQ's Forty Questions, #23b).

International Brotherhood of Electrical Workers
Local Union 340

2840 El Centro Road, Suite 115, Sacramento, CA 95833
Phone (916) 927-IBEW • FAX (916) 927-1074 • www.ibewlocal340.org

September 13, 2010

BLM Ukiah Field Office
Attention: Rich burns, 2550
North State Street, Ukiah 95482

Re: **Walker Ridge Wind Park, Lake & Colusa Counties**

Dear Mr. Burns,

IBEW (International Brotherhood of Electrical Workers) Local 340 represents over 2,000 members in eighteen (18) of the Northern Sacramento Counties. On behalf of this membership, I speak in **100% favor of the Walker Ridge Wind Park.**

Our main reason to support this project is the fact that renewable energy can supply a significant proportion of the United States' energy needs which will help us to become independent of foreign oil.

There have been many environmental studies of oil versus renewable energy which have proved using fossil fuels to create electricity greatly pollutes our air and water, creates toxic wastes and causes global warming. The impacts on the environment using renewable energy have been proven to be generally much smaller and much more localized (and therefore, much more controlled).

This project will also create quality jobs for local residents and many workers in all trades. Right now, work in California is very scarce and research has shown renewable energy is much more superior to fossil fuel, so in my book Walker Ridge Wind Park is a win-win situation for all!

Thank you for your consideration. Please feel free to call me if you have any questions.

Sincerely,
ELECTRICAL WORKERS' UNION
Local No. 340

A.C.Steelman
Business Manager

ACS/pp opeiu #29 afl-cio

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August 18, 2010

BLM Ukiah Field Office
Attention: Richard Burns
2550 North State Street
Ukiah, California 95482

via email: ukiahwindeis@ca.blm.gov

RE: Walker Ridge Wind Project scoping deadline

Dear Mr. Burns:

The Redwood Chapter of the Sierra Club, the nation's largest and oldest environmental organization, represents more than 9000 Club members in northwestern California, including some 400 members in Lake County, where the western portion of AltaGas Renewable Energy Pacific, Inc.'s proposed Walker Ridge Wind Project (CACA-49639) would be located. Combating climate change is central to the mission of the Sierra Club, which strongly favors the development of renewable energy sources on appropriate sites, as part of a comprehensive national strategy to reduce greenhouse gas emissions and dependence on fossil fuels. But as a matter of basic policy, the Club also believes that the costs and benefits of each such development must be assessed individually, taking into account both the potential significance of the renewable resource and any resulting harm to the "ecological, scenic, natural, wildlife, geological, educational, or scientific value" of the site. Because of the many sensitive natural resources of Walker Ridge, the area's high conservation value, and its geological complexity, we request that the scoping period on the project be extended to at least 90 days in order to provide an opportunity for a full presentation of the complicated potential impacts from the proposed wind project that must be evaluated in a comprehensive environmental analysis.

Potentially significant areas of impact from the proposed project include diverse biological resources, contamination of water resources, fire ecology, and the wilderness characteristics of the site and surrounding area. Walker Ridge's true potential for wind energy production is also of great concern. The complexity of these issues and the paucity of existing detailed information require that the public be given a longer period to propose specific areas for investigation.

Biological resources
Complex and potentially significant impacts to bats and to both resident and migratory birds from raptors to passerines go beyond consideration of possible nesting sites to include the Ridge's status as a migratory route, which has not yet been investigated. Development of this area also has the potential to sever a vital wildlife corridor connecting the Klamath region and Mendocino National Forest to the Cache Creek Wilderness and Knoxville wildlife area. Many sensitive serpentine-associated plant species and dependent fauna characterize this area, which the California Native Plant Society (CNPS) has recommended be designated an Area of Critical Environmental Concern (ACEC) because of its unusual botanical characteristics. In addition, it is a biological hotspot for dragonflies and damselflies, and home to at least five comparatively rare butterflies, which because of their tendency to gather on hilltops during the mating process may be particularly sensitive to wind power development.

Contamination of Water Resources
Mercury and chromium are known to be present in this region, which contains a number of abandoned mines where remediation is ongoing. Asbestos may also characterize the serpentine rocks and soils of Walker Ridge. Obvious potential exists for releasing air borne contaminants during the extensive grading needed to build energy tower pads and to widen the access road, and is of particular concern since the watersheds on both sides of the Ridge -- North Fork Cache Creek to the west and Bear Creek to the east -- have already been listed for mercury impairment. This is a significant environmental risk involving possible effects on human health.

Fire Ecology
Fire is an essential element of the chaparral ecosystem that prevails in much of the Walker Ridge area, and the changed fire suppression protocol that would be required if the Project becomes operative is yet another subject that needs detailed evaluation.

Wilderness Characteristics
The wilderness characteristics of the Walker Ridge region, which has been identified as a Citizens Proposed Wilderness Area, must be taken into account before permitting development on the site. Proposals to avoid or mitigate impacts to these special values should be evaluated in a regional context, taking into consideration the site's central location in the proposed Berryessa Snow Mountain National Conservation Area, a special status that has received widespread support from local individuals and organizations. Fragmentation of this large contiguous natural area could cause repercussions ranging far beyond the site itself, and by reducing the resilience of the larger habitat impair the ability of many species to maintain their populations in the face of climate change.

Resource Analysis
As a corollary to the examination of project impacts, detailed information about the Project's potential value as a source of renewable energy is an essential component of a reasoned decision on eventual approval or denial. Although the area was identified as a possible source of wind power production in the BLM's Resource Management Plan (2005), the succession of private companies that have withdrawn after investigating this possibility indicates that the resource is at best marginal, and its development driven as much by public financial subsidy as by inherent worth.

With so many complex issues at stake and the high level of public concern about the Project, extending the public scoping period to at least 90 days is needed to ensure an adequate level of community participation.

We look forward to your response to this request. Please do not hesitate to contact me at any time with questions or comments.

Yours sincerely,

Redwood Chapter Vice Chair
vbrandon@lakelive.info
(707) 994 1931

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Yolano Group
MOTHERLODE CHAPTER

Explore, enjoy and protect the planet

BLM Ukiah Field Office
Attention: Rich Burns
2550 North State Street
Ukiah, CA 95482

October 6, 2010

RE: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA.

Dear Mr. Burns:

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal. We have some concerns about the proposal and will outline them below. The Sierra Club Yolano Group certainly supports renewable energy development, and we understand the necessity to meet our state and federal government goals for procuring more of our energy from renewable sources, but some projects are not appropriate or responsible. We believe that the location proposed for this project is not an appropriate site.

Walker Ridge is a very special place with many rare and sensitive biological, ecological, and geological qualities. The Alta Gas project threatens this area's biological and water resources, its scenic beauty and wilderness characteristics. Under the general description of the project, it is stated that the project site was chosen in part because the project here would have fewer impacts on environmental resources than in other areas. This is simply not the case. This is an environmentally sensitive area with rare serpentine soils and other special geologic features and their attendant plants and wildlife. The BLM should protect this wild, scenic, and special place and deny the wind project at this location. There are other options including land already impacted by other industrial uses or agriculture or lands with inferior resource values.

General Project Description. The plan is to develop a small wind farm on top of Walker Ridge. The preferred project is to construct, operate, maintain and decommission the project on 8,157 acres of land under BLM's jurisdiction. The facility would produce 60 to 70 MW of electricity from 29 to 42 wind turbines. The towers would be 360 feet tall on slabs 52 feet in diameter and 10 feet tall. It would also involve construction of roads and some underground transmission lines and widening the existing trail.

Due to the height of the towers, the project is required to submit FAA Form 7460, Notice of Proposed Construction or Alteration, to the FAA to identify any required air

safety measures. The project will have to comply with the FAA's aircraft safety lighting requirements for structures greater than 200 feet tall. To be in compliance, L864 red flashing lights with a minimum intensity of 2,000 candelas would be installed on the towers and operated at night to warn aircraft of the presence of the project. It is anticipated that 12 FAA lights would be installed on each tower.

Construction also has the potential to affect surface waters, during clearing, grading and construction activities. Construction of 29 to 42 pads of the size mentioned above is on a massive scale and will have huge impacts. These activities will result in massive earth movement and the potential for erosion and sedimentation. This could result in pollutants and sediment entering down slope waters.

Comments. The size of the project makes it marginal at best. Other counties where a similar project was proposed rejected it. The impacts on the environment and fragile plant and animal communities far outweigh any benefits that might ensue from this project. This is marginal energy production versus major ecological issues. Also, the towers would be over 300 feet tall and in the Pacific Flyway, a major bird migratory route of global importance.

There has been considerable bird collision research in California directed primarily at transmission lines and wind turbines. Birds are particularly vulnerable to colliding with these structures. For example, the most recent estimates of bird strikes at Altamont Pass Wind Resource Area was roughly 9,000 to 15,000 bird kills per year (Smallwood and Karas, 2009). The Tehachapi Pass WRA kills roughly 4,880 to 13,493 birds per year (Smallwood, unpublished data). High Winds Project in Solano WRA kills 272 to 488 birds per year, the Shiloh I Wind Energy Project kills 927 to 1529 birds per year. SMUD's WRA kills 47 to 92 birds per year (Smallwood, unpublished data). And these numbers may be a fraction of the real numbers of birds killed by wind turbines, due to high scavenger removal rates of bird carcasses.

The USFWS has certain guidelines that pertain to communication towers over 200 feet. Some of the guidelines would be applicable to wind towers as well. These guidelines include that only white or red strobes be used, not red steady or flashing lights. Research shows that birds, in particular night migrants, are somehow attracted to or disoriented by red flashing or steady burning lights resulting in the birds flying toward the lights and colliding with the towers. The guidelines also state that towers should not be located in any known migratory route or pathway. The Pacific Flyway is a well-known migratory route through which millions of birds pass annually. The project in this location could result in the death of hundreds to thousands of birds annually. Impacts on birds, in particular night migrants and special status species, by the project must be evaluated in the EIS and appropriate mitigation measures defined to reduce or eliminate these impacts. These impacts and measures must be clearly defined in the EIS for public review and comment.

The presence of mercury and chromium in the serpentine soils and rocks (USGS reports) on Walker Ridge and other adjacent lands constitutes a potential human

health hazard, should disturbance occur to the ridge landscape. Large-scale soil movement, including the clearing, grading and construction of the pads and towers, could mobilize the mercury and chromium laden soils and increase sedimentation into nearby water resources. The impact of construction of this project on surface water through sedimentation of pollutants to nearby water resources must be evaluated in the EIS and appropriate mitigation measure defined to reduce or eliminate this impact to protect water resources and human health. These impacts and measures must be clearly defined in the EIS for public review and comment.

Other Environmental Considerations. Walker Ridge is comprised of steep terrain and ridgelines covered with diverse vegetation types and serves as habitat for multiple species of plants and animals, many of which are special status species including species of special concern, threatened or endangered. The area is also used for several forms of out door activities including camping, hiking, fishing, boating, hunting and wildlife viewing. The region surrounding Walker Ridge contains a very diverse ecological community including serpentine chaparral, grasslands, oak woodlands and endemic species.

This area has the potential to host many special status plant species. The California Natural Diversity Database (CNDDB) maintained by the Department of Fish and Game lists plant species that are sensitive, rare, threatened or endangered. This list was consulted to determine the potential for any such species to occur within the project area. Based on the CNDDB search, it was determined that there are no known occurrences of federally listed plants within the project site. However, the CNDDB was never intended to be used in this way. We will address this below.

The Walker Ridge area also supports many species of wildlife including Tule Elk, deer, bald eagle, and golden eagle. The CNDDB was reviewed to identify any special status species that might occur within 5 miles of the project site. (See previous comment re the CNDDB.) Since all actions on BLM lands are subject to requirements of federal regulations including the Migratory Bird Treat Act, NEPA and the Bald and Golden Eagle Protection Act, the USFWS was consulted and confirmed that there are no special status plants or animals occupying the project site. (How was the USFWS able to confirm this? Was their confirmation based on the data from the CNDDB? From the documents provided, that appears to be the case.)

Comments. Apparently, no protocol-level scientific surveys have been done to document the presence or absence of special status species, so it is difficult to understand how any agency was able to confirm the absence of any special status species. In addition, the CNDDB was never meant to be used to confirm or deny presence of special status species by itself. It is based on volunteer reporting of species detections wherever surveys were possible. It is not a scientific program. It is not complete or comprehensive and it is not necessarily up to date. The data base warns against making negative findings of special status species based on the records of the CNDDB. In fact, the DFG posts a disclaimer on its website stating that they “cannot and do not portray the CNDDB as an exhaustive and comprehensive

inventory of all rare species and natural communities statewide. Field verification for the presence or absence of sensitive species will always be an important obligation of our customers." Therefore, it cannot be concluded that there are no special status species occupying the project site based on current information.

Migratory birds affected by this project are protected under the federal Migratory Bird Treaty Act. Many are also protected under CEQA, NEPA and by the Endangered Species Act. Other special status species (including bats, reptiles, insects and mammals) that might occur in the project area and that could be directly impacted as a result of the turbines or whose habitat would be lost due to construction of the project are protected under CEQA, NEPA and the ESA.

The project site has the potential to host many special status plant species. As noted in the "General Description of Site Characteristics and Potential Environmental Issues", because of the particular geology and access available on BLM lands, botanists use the area for study. As a result, many special status plants have been documented here, although these were apparently not protocol-level surveys.

Protocol level surveys must be done for the EIS and appropriate mitigation measures developed to satisfy the requirements of CEQA, NEPA, the MBTA and the ESA and subject to public review and comment. The mitigations must include protection of special status plant species and their habitat where possible or compensation for the loss of the species or habitat due to implementation of the project, such as procurement or creation of suitable habitat elsewhere to compensate for that lost. The mitigations must include protection of special status bird, insect and animal species and their breeding and/or foraging habitat where possible or appropriate compensation for loss of breeding, nesting and foraging habitat due to implementation of the project, such as procurement or creation of appropriate habitat land elsewhere to compensate for that lost. These impacts and mitigations must be clearly identified in the Draft EIS for public review and comment.

Five relatively rare species of butterflies are found at Walker Ridge. Butterflies are of special concern because many of the species, including several of the ones that occupy this area, use aggregation on hilltops as an essential part of the mate-finding process. Impacts on these butterflies must be evaluated in the EIS and appropriate mitigation measures defined for public review and comment.

The question of how wind towers at this site may affect the air and flight column for birds, bats, butterflies, dragonflies, and damsel flies needs review and input from the scientific community. An assessment of impacts on these species must be included in the EIS and appropriate mitigations defined.

The Walker Ridge area contains lands with wilderness characteristics. Potential wilderness areas must be assessed prior to any irrevocable commitments. This area is also part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to

the north through to the Cache Creek Wilderness Area and Knoxville public lands to the south. Implementation of this project could interrupt this connectivity. This also must be considered in the EIS and appropriate actions outlined to minimize or eliminate this impact.

This region provides many opportunities for bringing together communities of the Bay Area and the Central Valley for recreation and the exploration of nature. Development may preclude recreational uses including public use of the ridge, ridge road and non-motorized use of the Bald Mountain Trail. Simply posting signs on Walker Ridge Road is not sufficient mitigation for loss of these recreational opportunities. These impacts must be fully addressed in the EIS and appropriate mitigation measures defined, including avoidance of areas currently or potentially used for recreational purposes and for the exploration of nature.

Alternatives. All alternatives should be considered in the EIS including: No Action; alternative locations including the Geysers and Rio Vista; designation of the entire Walker Ridge as an Area of Critical Environmental Concern—the entire area of 14,000 acre unit must then be surveyed and evaluated, not just the affected area or the 8,000 acre right-of-way; no development on the west side of Walker Ridge; no development along the Bald Mountain Trail.

Wind Data Information. The public cannot fairly evaluate the proposed wind development without access to the wind data information. Alta Gas refuses to release this data. These are public lands and the public has a right to that data in order to make reasoned decisions concerning this project on their lands. Without this information, it is not possible to make informed decisions, and this project must be opposed.

Thank you for the opportunity to comment. Please include me on the official notification list for all matters concerning Walker Ridge.

Sincerely,

Pamela S. Nieberg

Pamela S. Nieberg
Chair, Sierra Club Yolano Group

Dear Bureau of Land Management

Good planning at its most basic level balances the outcomes of projects against their costs. The best projects have high outcomes and low costs. Many, however, are more problematic since their outcomes and costs are more nearly equal. The proposed Altagas wind farm on Walker Ridge is not one of those. It is the worst possible project: One that offers no outcome at the highest cost.

The California Resources Agency Bulletin 185 – Wind in California – identifies Walker Ridge as the part of California with the lowest wind resource, in other words the stillest air and the least wind. Nothing since has significantly changed that picture.

So why does Altagas want to build on Walker Ridge? The answer is plain: generous subsidies for so-called alternative energy and likely also greenwashing a less than environmentally benign image in its Canadian home. What Altagas is proposing is a subsidy farm, not a wind farm.

And the costs of constructing anything on Walker Ridge are unacceptably high. It has long been identified as one of North America's great biodiversity treasure houses, for example, the California Native Plant Society long ago recommended it as an Area of Critical Environmental Concern. Its great serpentine rock outcrop is home to numerous rare and endemic species and its non-serpentine areas have been photo-documented as having the greatest mass native flower displays in northern California. The Juxtaposition of these two very different environments – serpentine and non-serpentine – is what makes Walker Ridge so environmentally significant – a place any civilized society would joyfully protect in its full natural integrity. Any less is the poorest possible planning.

Just a few of Walker Ridge's Rare and Sensitive Species

1. Astragalus rattanii jepsonianus
2. Balsamorhiza macrolepis macrolepos
3. Brodiaea coronaria rosea
4. Castilleja rubicundula rubicundula
5. Chloragalum pomeridianum minus
6. Eriogonum nervulosum
7. Harmonia hallii
8. Hesperolinon drymarioides
9. Layia septentrionalis
10. Silene campanulata campanulata

Dr. Glen Holstein
Botanist
California Native Plant Society – Sacramento Valley Chapter
1509 Pacific Drive
Davis, CA 95616
e-mail: holstein@cal.net

Walker Ridge Wind Project – Public Scoping Comments

Submitted by Ryan O'Dell – Botany/Soils/Serpentine Ecology

October 8, 2010

Serpentine (ultramafic) landscapes are exceptionally rare in California, comprising less than 1% of the total land area in the state. Serpentine soils are stressful for plant growth due to adverse soil chemistry (low macronutrient, high magnesium, low calcium, and high heavy metal concentrations). As a result, plant growth on serpentine soils is often very slow and vegetation is slow to recover following disturbance. Although serpentine soils are adverse for plant growth, they harbor a high diversity of plant species, particularly endemics. The Walker Ridge serpentine mass harbors several rare serpentine endemic plant species including the following:

Species	Family	Status
Packera clevelandii	Asteraceae	CNPS List 4
Streptanthus brewerii var. *hesperidis*	Brassicaceae	CNPS List 1B
Streptanthus morrisonii	Brassicacceae	CNPS List 1B
Astragalus clevelandii	Fabaceae	CNPS List 4
Astragalus rattanii	Fabaceae	CNPS List 1B
Brodiaea coronaria ssp. rosea	Liliaceae	CNPS List 1B
Fritillaria plurifolia	Liliaceae	CNPS List 1B
Eriogonum nervulosum	Polygonaceae	CNPS List 1B

The Walker Ridge contains extensive exposures of serpentine rock and at least half of the proposed Wind Generation Facility is planned to be established on serpentine soils leading to adverse temporary or permanent impacts to soils and vegetation. There are also concerns that the project may result in significantly increased exposure of the visiting public, as well as wind facility workers to naturally occurring asbestos which is known to occur in serpentine rock and soils.

The following impacts should be addressed by the Walker Ridge Wind Generation Facility DEIS:

Naturally Occurring Asbestos (NOA) – Serpentine soils are known to contain high concentrations of chrysotile asbestos (naturally occurring asbestos) which can become airborne with soil disturbance and adversely impact human health (asbestosis). Effects of serpentine soil disturbance on human health (including the public and wind generation facility workers) should be analyzed. An air monitoring plan for airborne naturally occurring asbestos should be developed and implemented during the construction phase. Activity-based air sampling (vehicle driving scenario [lead vehicle and following vehicle]; walking/hiking scenario) in coordination with the EPA should be undertaken to determine what long-term exposure levels will be for the visiting public and wind generation facility workers due to road modifications (grading, widening) and increased traffic. Crushed serpentine should not be used as road base aggregate. If soil disturbance or road grading occurs during dry conditions of the construction phase, the substrate

should be wetted to reduce dust exposure. If activity based sampling (vehicle driving) on serpentine at the north end of Walker Ridge indicates that the visitor is being exposed to levels of asbestos higher than those regarded as acceptable by the EPA under the IRIS model (http://www.epa.gov/IRIS/subst/0371.htm), the Wind Generation Facility project should include permanent stabilization of the road surface (paving with asphalt). Any spur access roads to turbines off of Walker Ridge road through serpentine should also be paved.

Illegal OHV use proliferation – Construction of new access roads has the potential to lead to increased illegal OHV use, coincident with increased route mileage. The DEIS should analyze how increased route mileage on Walker Ridge may encourage illegal OHV use and what the potential impacts of such OHV use may be including soil erosion and vegetation loss.

Invasive plant species seed introduction with imported substrates – Imported substrates such as road base aggregate have the potential to introduce invasive plant species to serpentine soils as well as alter the unique soil chemical and physical properties of serpentine soils. Efforts should be made to ensure that imported substrates are weed free and that imported substrates are not spread in areas other than those where they are absolutely needed.

Chemical or physical modification of serpentine soils – During construction and revegetation phases, efforts should be made to limit chemical or physical modifications of serpentine soils. Serpentine areas should only be topsoiled with serpentine soil (not nonserpentine soil or imported soils). Contamination of serpentine soils with lime from concrete pouring should be limited as that will alter the unique calcium to magnesium ratio balance of the soil. Compacted soils should be sufficiently decompacted prior to revegetation. Amendment of serpentine soils such as chemical fertilizers and organic amendments (compost) should be avoided as these are known to promote noxious plant species invasion.

Use of native, local serpentine-adapted plant materials for serpentine soil revegetation - Serpentine soils are known to support morphologically and physiologically adapted plant species and ecotypes. Efforts should be made during revegetation to utilize only native, local serpentine-adapted plant materials for revegetation. Plant materials should be planted at appropriate time of season (fall or winter following first rains). Hydroseeding is a largely ineffective method for revegetation in California and should be avoided.

Disruption of wildlife - Wind turbines generate noise and also present a major hazard to flying animals (birds, bats). Long-term impacts to wildlife should be analyzed. Analyzed aspects should at minimum include temporary and permanent anticipated disruption of ground dwelling animals as they avoid habitat due to artificial lighting and noise generated by the turbines. Additionally, injury and mortality of flying animals from being struck by turbines should be analyzed.

Viewshed – Walker Ridge as largely an undeveloped, public open space which numerous user groups enjoy as such. Development of the wind project has the potential to significantly alter the viewshed as well as generate noise from the turbines, diminishing the recreational experience of visitors to BLM land.

11 October 2010

UKIAH FIELD OFFICE
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BUREAU OF LAND
MANAGEMENT
UKIAH CA

Peter Warner
Rare Plant Chair
Sanhedrin Chapter, California Native Plant Society
P. O. Box 2023
Sebastopol, CA 95473

Bethney LeFebvre
Bureau of Land Management, Ukiah Field Office
2550 North State Street
Ukiah, CA 95482

RE: AltaGas Renewable Energy Pacific Inc. proposal for Walker Ridge

To Whom It May Concern:

I have reviewed sections of the "Plan of Development: Walker Ridge Wind Generation Facility" (June 24, 2010), issued by the Bureau of Land Management's Ukiah Field Office. The following comments pertain to this document.

Section 2.6 Site Preparation, Vegetation Removal, and Treatment

Vegetation removal constitutes loss of plant and animal habitat, yet the impacts arising from this activity are not quantified or discussed in sufficient detail to provide the public a means to assess potential impacts, nor are alternatives or mitigatory measures provided. Vegetation types on Walker Ridge include those listed by the California Department of Fish & Game as sensitive, fulfilling the ecological criteria for rarity, and potential impacts thereon must be disclosed in detail in environmental documentation for this project.

Noxious Weed Control is not described in detail sufficient to estimate its effectiveness, and various references (e.g., Noxious Weed Control Plan, Noxious Weed Risk Assessment Form) are not provided in order to supplement the existing vague provisions. Specifically, what measures will be implemented to avoid or reduce introduction and establishment of noxious weeds? What, indeed, is on the BLM list of noxious weeds that could become established at the project site? With due consideration to the various federal provisions for reducing the spread of invasive plant species, I see no references herein to BLM's legal requirements to abide by federal and state laws regarding the movement of either California-listed noxious weeds, nor the numerous other policies governing the dispersal of invasive plants and their propagules. The information provided is superficial, not documented sufficiently, and unacceptable for its lack of detail.

Section 2.13.4 **Reclamation Plan**
How will BLM and the applicant comply with California Environmental Quality Act

provisions that appropriate mitigation measures to compensate from project impacts be implemented concurrent with project activities? How do BLM and the project applicant argue, with any scientific credibility, that soil disturbance, loss of native plant diversity, and disruption of soil organisms and their chemical processes can be compensated through erosion control best management practices, or the introduction of any plant material, even if "native," or any other undisclosed methods? What quality control practices and on-site measures will be established to ensure that the site is left in the same condition as that prior to project implementation? "Restoration" of "disturbed areas to original conditions commensurate with the ecological setting..." sounds like a fine provision, but in reality, my prior observations of construction projects, on both private and public lands, indicate that restoration will be applied in name only, not accomplished "commensurately," ecologically or aesthetically, and therefore, a lever used to generate greater public acceptance. In short, where is the legal requirement for the applicant, and the scientific demonstration that restoration will actually achieve its stated aims? They are not provided in the plan.

Section 5.1.1 **Protected or Special-Status Species and Habitats**
No provision is made in this section for rare vegetation types, as required by the California Environmental Quality Act. Many rare vegetation types have not been documented in the California Natural Diverstiy Database, yet disclosure of potential impacts is nevertheless required. A list of these types is available from the California Department of Fish & Game.

Table 5.1, Special Status Plant and Wildlife Species that May Occur within the Project Area, is incomplete. In addition to those listed, the following plant taxa from the California Native Plant Society Inventory occur within the general area of the project, along roads that will affected by increased traffic, road grading, erosion, and other impacts associated with the project, or may otherwise be present, if previously undocumented from the project area:

- *Balsamorhiza macrolepis* var. *macrolepis*
- *Calystegia collina* ssp. *tridactylosa*
- *Castilleja rubicundula* ssp. *rubicundula*
- *Hesperolinon bicarpellatum*
- *Hesperolinon drymarioides*

Despite the statement from the U. S. Fish and Wildlife Service that no federally listed plants or animals occur within the project area, this project is not exempt from the provisions of the California Environmental Quality Act, which includes the requirement that potential impacts on State-listed and CNPS Inventory List 1B and 2 plants must also be disclosed during project environmental review. Reference to existing CNDDB documentation is insufficient for any project, as many plant populations are not so documented. Full botanical surveys, according to California Department of Fish & Game protocols, of all potential project impact areas are necessary in order to disclose potential impacts in accordance with both NEPA and CEQA.

Section 5.2.1 **Special Status and Sensitive Species and Habitats**
The Applicant Proposed Measure (APM) BIO-1, "Avoid or minimize impacts to special-status plants within the ACEC [Area of Critical Environmental Concern," is insufficiently described or discussed to provide information on how sensitive plants will be "avoided" or impacts "minimized," especially in light of the fact that several of the List 1B plants grow immediately along the edge of Walker Ridge Road. The proposed measure to "avoid" impacts is ludicrous, especially in light of BLM's currently negligent management of sensitive plant habitats on Walker Ridge, and "minimization" has proven to be "disclosure" code for allowing destruction of plants and their habitats. No measures for avoidance or minimization are provided other than the extremely vague and unsubstantiated words in the APM, and prior observations are entirely pertinent when compliance with existing environmental laws and regulations are at stake.

Section 5.2.2 **Special Land Use Designations**
The location of project development and Walker Ridge Road, as an access corridor to the proposed facilities, within an Area of Critical Environmental Concern, is summarily dismissed by reference to APM-BIO-1, to which I've already referred as an unreliable and vacant provision lost within unsubstantiated bureaucratic rhetoric. The Bureau of Land Management is responsible for reducing human impacts on sensitive habitats and species within any ACEC, and the entire project is inconsistent with and deleterious to the continued viability of the ACEC on Walker Ridge. Promises from the applicant to "avoid" and "mitigate," without provision of detailed mitigation measures, are completely insufficient as a means to provide full disclosure, as required by both NEPA and CEQA. Project approval, without such full disclosure of all means and methods of avoidance and mitigation measures, would be tantamount to a violation of those laws, and a violation of the public trust.

Omitted Information and General Comments
In general, the avoidance and mitigation measures provided in the plan are insufficient and unsubstantiated, contributing to its overall character as a deception to the public's right to know the full range of impacts stemming from the project. Among other errors of omission, the current plan of development provides no information on indirect or cumulative impacts arising from this project. The long-term environmental damage sustained by Walker Ridge ecosystems from this project will be, essentially, permanent, and the short-term gains limited to the project applicant and, perhaps, the careers of a few BLM employees. The plan does not disclose the potential for environmental impacts outside the project area, and they may be significant simply because of the scale of this project. No mention is made that other, higher quality sites for wind power generation might be available, without sensitive habitats sustaining nearly the extent of impacts as will result from this project. The simple fact is that this project will result in a net loss of native plant and animal habitat, and lasting impacts far beyond its immediate geographical scope and far into the future. The Walker Ridge area will not recover its current ecological and aesthetic values in many human lifetimes, if ever.

The "alternatives" discussed in the plan are, at best, disingenuous, and otherwise a token fulfillment of a full discussion of real alternatives. The "alternatives" provided merely

span the breadth of proposals that are economically viable to the applicant, AltaGas, and do not include even smaller scale development, let alone the "no project" alternative. As such, this plan appears to be nothing more than a sales pitch by the applicant, with a BLM rubber stamp for its approval.

The case made for the "need" for the project is not convincing in the least, more of a testimony to politically motivated public relations incentives than real energy independence for consumers. I find the lack of forthright admission that the primary motivation is that of economic profit for AltaGas to be a glaring example of the plan's failure to disclose impacts to the public – that disclosure being a right for the citizen and a requirement of the applicant and its sponsoring agency -- the essence of both NEPA and CEQA. AltaGas is a non-local, non-American corporation that will provide neither jobs nor consumer benefits to the area economy. Regardless of the BLM's "need" to meet "mandates" for siting energy production facilities, this need does not supersede its responsibility for sustaining environmental quality and for implementing sound ecological management.

I find the BLM's complicity with corporate development to be a betrayal of the agency's responsibility to manage the lands under its stewardship in an ecologically appropriate manner. With truly diligent planning, an approach that genuinely considered the project's likely extensive, negative environmental impacts, BLM would have rejected this proposal outright as inconsistent with the ecological values of the lands under its jurisdiction. Nothing in this plan will promote the ecological health of Walker Ridge and the surrounding area, nor will the project even benefit the local human community. Corporate involvement in public land management is incompatible with BLM's responsibility as a public agency and land steward, especially where lasting damage to sensitive habitats is under consideration. I would consider BLM's rejection of this application, in its entirety, a step in the right direction towards managing Walker Ridge for its ecological value and all the accruing benefits to wildlife and people.

Sincerely,

Peter Warner

Peter Warner

To: **Rich Burns, Manager of BLM Field Office Ukiah, CA**
Via email: ukiahwindeis@ca.blm.gov
From: Bear Valley Ranch LLC and Gabrielsen & Company
Re: Walker Ridge Wind Energy Project

In response to your NOP for this project, we are submitting the following:

We are the owners of the Bear Valley Ranch. Bear Valley Ranch is a certified organic ranch consisting of almost 13,000 acres and covering approximately nine miles of Bear Valley. We share a boundary with the BLM Walker Ridge land of over six miles. Our land is the eastern contiguous neighbor along the entire length of the 428 ft tall Wind Turbines contained within the Industrial Wind Park as described to us by AltaGas, Mr. Peter Eaton.

Bear Valley is a unique watershed protected along the majority of its length with conservation easements that have been put in place to protect this unique and largely undeveloped ecosystem. Walker Ridge prominently defines the Western edge of this quiet rural valley rising over 2,000 feet from the valley floor. This project proposes to place 29 to 40 428 ft. tall lighted structures atop miles of this ridge at its highest and most visible section.

Our concerns are many:

Light Pollution: Along the entire eastern boundary of the turbine placement there is no electricity or gas servicing the valley. Any power is generated by the individual property owners through solar or other off-grid means. This fact along with the extremely low density in the valley results in minimal existing lighting. The turbines are required to have aviation lighting and we fear that the support structures will contain some form of additional lighting for maintenance, security or other reasons. What is now a dark nighttime valley will have miles of the ridgeline illuminated with artificial light during every hour of darkness.

Sound Pollution: There is very little ambient noise in this largely undeveloped valley. Our understanding is that these turbines can produce up to 60 - 70 decibels of constant noise. Placing many dozens of these sound producers along miles of a ridgeline that overlooks a very quiet valley could result in the production of sound pollution on a large scale.

Aesthetics. Because the turbines will be located on the ridgeline, they will be visible from surrounding properties, which will have a negative impact on aesthetics—i.e., the turbines will impair scenic ridgeline views and spoil the natural viewscape.

Hazardous Materials Contamination: We assume that this Industrial facility will use petroleum based lubricants and solvents along with other hazardous materials on a regular basis. This industrial facility is located along miles of a ridgeline that drains to our property. We are very concerned about the potential for environmental contamination

due to this development at the source of the watersheds that empty onto our organic ranchland.

In addition, we are extremely concerned about the potential for pollution from storm water runoff during project construction. There will be vehicles, a concrete batch plant, sediment from disturbed areas, etc. The runoff from these activities could negatively impact the watersheds.

Loss of Organic Status: Our ranch is a certified organic ranch. We are concerned that the hazardous material contamination mentioned above may jeopardize our organic ranch status. In addition, according to the Development Plan, the project may use herbicides during construction to remove vegetation from construction areas. Presumably, the project could use herbicides for ongoing maintenance as well. Runoff from these activities could threaten our ranch's organic status.

The loss of our organic status would have a very large negative economic impact on our operation because organic certification allows the ranch to command a premium price for its products

Increased Access: Historically our ranch has had issues with wildlife poachers entering our property via BLM land. These poachers have entered by accessing Walker Ridge Road and then worked their way down from the ridge to the valley floor by means of spur roads, firebreaks and/or trails as they were available. This industrial project will greatly improve these roads and trails as described in the Development Plan. This will only increase uncontrolled access to our property.

The increase of poachers on our property due to increased access will result in negative environmental impacts such as depredation of local wildlife species such as deer and elk. Also, it will result in great disturbance to the natural habitat from increased illegal off-road traffic, and much of the habitat likely is of a sensitive nature.

Additionally, several illegal marijuana growing developments have been discovered and destroyed by the Stonyford sheriff's department between the proposed industrial wind farm area and our property. Our understanding is that these are not only extremely destructive to the environment but are very dangerous to life and safety as they are run by and defended by organized crime groups. As described above for poacher access, we are concerned that the industrial scale of road and trail improvement required for this industrial wind farm will only increase ease of access for these organized crime based marijuana developments. These growers deplete the local aquifers by re-directing naturally occurring springs for their own use, thus depriving the native flora and fauna of water. They use large quantities of herbicides and possibly pesticides. They kill a large amount of wildlife for food and sport. Lastly, they leave behind large amounts of trash in the form of used irrigation lines, water bottles, used bullet cartridges and projectiles, human waste and other general debris.

Devaluation of Property Values: Bear Valley is a little over an hour away from the heavily developed San Francisco Bay Area as well as the Sacramento area and yet remains undeveloped. The land has a great value because of its undeveloped nature, as a peaceful sanctuary that is quickly reached from these major urban cores. The unspoiled vistas and quietness of this valley will be greatly impacted by the construction of an industrial wind park with miles of 428 ft. lighted, sound emitting turbines along the valley rim that will be visible from the majority of our property in Bear Valley. We are concerned that we will lose a great deal of property value, which will result in physical impacts to the environment due to lack of ability to keep the property in a good state, for example.

Raptors, Migratory Birds and Bats: Raptor species are known to be present in the area. Importantly, the AltaGas project brochure contains a map showing "bald eagle" near the project site—which perhaps indicates a nesting site. Golden eagles are common in the area and are regularly seen. It is well documented that wind turbines have a high raptor mortality rate. As a result, the raptors (including the bald eagle and golden eagle) will experience significant negative impacts from operation of the turbines. Further, the construction of the wind farm itself will result in disturbance of habitat, etc., which also will negatively impact raptors.

Night flying migratory birds will be disoriented by this 3,300 – 3,900 ft high and miles long wall of FAA required aviation lighting in this now natural, dark area resulting in migratory bird mortality.

In addition to the high mortality rates for raptors, wind turbines also have a high mortality rate for bats, which are present in the area.

Special Status Wildlife Species: There are numerous wildlife species in the vicinity that may classify as special status species and could be affected by the project, such as from light and noise pollution (particularly nocturnal species), as well as through habitat disturbance, noise, increased traffic (wildlife kills on roads), etc.

Alternatives: It appears that AltaGas has performed an analysis of alternatives in the project Development Plan. However, this analysis does not address a reasonable range of alternatives. It only gives detailed consideration to a single alternative that is identical to the proposed project except that it would use different turbines (so it is essentially the same project but with a larger number of smaller turbines). A better evaluation of alternatives, both on- and off-site, needs to be undertaken given the sensitive nature of Bear Valley, which will be significantly impacted by the project.

Sincerely,

Donlon H. Gabrielsen

Redbud Audubon Society, Inc.

P.O. Box 5780
Clearlake, CA 95422

Comments on the Walker Ridge Wind Generation Facility
scoping and focus of environmental review

Oct. 12, 2010

Roberta Lyons
Conservation Chair
Redbud Audubon Society, Inc.
(707) 994-2024 roberta.lyons@att.net
13806 Cliff Drive
Lower Lake, CA 95457

The Redbud Audubon Society, Inc., of Lake County is extremely concerned with the possible impacts the proposed Walker Ridge Wind Generation Facility will have on a variety of resident and migratory bird species as well as bats. As Conservation Chair for the society, I'm commenting on the scope and focus of the proposed environmental review with some specific areas of concern.

One of our main concerns with the wind farm Environmental Impact Statement (EIS), is how will the bird study accurately determine impacts on resident and migratory bird species and bats in the formation of the baseline data? We are concerned that no night time studies are planned to determine whether there are night time migrations occurring over or near the sight. This is a concern for the migration habits of the Western and Clark's grebes as well as other night time flyers, like owls, other birds, and bats. We believe it will be prudent to begin the study assuming that birds fly/migrate between Clear Lake, Indian Valley Reservoir, the Central Valley, the Coast, and the Bay Area until the study shows otherwise or there is existing data showing no such migration routes occur.

How will it be determined that the wind farm is or is not a night time threat if night time surveys are not conducted? Grebes migrating to Clear Lake sometimes number in the thousands.

Once it is determined what species are affected and what the mortality rate for each species is, will there be a determination of the cumulative mortality (not just this wind farm but others along the West Coast) for each species? How will that mortality affect the survivability of the species in our area and region, and within the migratory range of the species? What agency sets the acceptable mortality rates? Regardless of the rates, increased mortality will affect the number of birds seen/experienced by residents of this region (Lake and Colusa counties). Who determines what acceptable mortality is for the residents of Lake and surrounding counties?

In conclusion:

- There should be night monitoring for migratory birds, owls and bats for use in preparation of the baseline data for the EIS.
- A cumulative impact report of wind farms along the West Coast on bird mortality and species survival is needed.
- The California Energy Commission's *Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development* should be used in developing the mitigation plan.
- Establishment of a concrete and meaningful mitigation plan is needed. It should include compensatory mitigation, detailed monitoring methodologies and requirements, adaptive operations, and mitigation mechanisms.
- A technical advisory committee should be established. This committee would oversee the mitigations monitoring and reporting program to review data and make recommendations for the implementation of adaptive mitigation measures. This committee should include members from a non-profit organization dedicated to conservation.

Sincerely,
Roberta Lyons
Conservation Chair
Redbud Audubon Society, Inc.

To: Rich Burns, Manager of BLM Field Office Ukiah, CA
Via email: ukiahwindeis@ca.blm.gov
From: Ms. Lucille Penning and Ms. Catherine Townzen
Re: Walker Ridge Wind Energy Project

In response to your NOP for this project, we are submitting the following:

We are the owners of over 1,500 acres in Bear Valley Contiguous to the BLM land that the Industrial Walker Ridge Wind Farm is proposed. Our family has owned land in Bear Valley continuously for well over 100 years.

We strongly object to this project. We join our Bear Valley neighbors in opposition to this large scale industrial project.

Our concerns are many:

Light Pollution: Along the entire eastern boundary of the turbine placement there is no electricity or gas servicing the valley. Any power is generated by the individual property owners through solar or other off-grid means. This fact along with the extremely low density in the valley results in minimal existing lighting. The turbines are required to have aviation lighting and we fear that the support structures will contain some form of additional lighting for maintenance, security or other reasons. What is now a dark nighttime valley will have miles of the ridgeline illuminated with artificial light during every hour of darkness.

Sound Pollution: There is very little ambient noise in this largely undeveloped valley. Our understanding is that these turbines can produce up to 60 - 70 decibels of constant noise. Placing many dozens of these sound producers along miles of a ridgeline that overlooks a very quiet valley could result in the production of sound pollution on a large scale.

Aesthetics. Because the turbines will be located on the ridgeline, they will be visible from surrounding properties, which will have a negative impact on aesthetics—i.e., the turbines will impair scenic ridgeline views and spoil the natural viewscape.

Hazardous Materials Contamination: We assume that this Industrial facility will use petroleum based lubricants and solvents along with other hazardous materials on a regular basis. This industrial facility is located along miles of a ridgeline that drains to our property. We are very concerned about the potential for environmental contamination due to this development at the source of the watersheds that empty onto our organic ranchland.

In addition, we are extremely concerned about the potential for pollution from storm water runoff during project construction. There will be vehicles, a concrete batch plant, sediment from disturbed areas, etc. The runoff from these activities could negatively impact the watersheds.

Increased Access: Historically our ranch has had issues with wildlife poachers entering our property via BLM land. These poachers have entered by accessing Walker Ridge Road and then worked their way down from the ridge to the valley floor by means of spur roads, firebreaks and/or trails as they were available. This industrial project will greatly improve these roads and trails as described in the Development Plan. This will only increase uncontrolled access to our property.

The increase of poachers on our property due to increased access will result in negative environmental impacts such as depredation of local wildlife species such as deer and elk. Also, it will result in great disturbance to the natural habitat from increased illegal off-road traffic, and much of the habitat likely is of a sensitive nature.

Additionally, several illegal marijuana growing developments have been discovered and destroyed by the Stonyford sheriff's department between the proposed industrial wind farm area and our property. Our understanding is that these are not only extremely destructive to the environment but are very dangerous to life and safety as they are run by and defended by organized crime groups. As described above for poacher access, we are concerned that the industrial scale of road and trail improvement required for this industrial wind farm will only increase ease of access for these organized crime based marijuana developments. These growers deplete the local aquifers by re-directing naturally occurring springs for their own use, thus depriving the native flora and fauna of water. They use large quantities of herbicides and possibly pesticides. They kill a large amount of wildlife for food and sport. Lastly, they leave behind large amounts of trash in the form of used irrigation lines, water bottles, used bullet cartridges and projectiles, human waste and other general debris.

Devaluation of Property Values: Bear Valley is a little over an hour away from the heavily developed San Francisco Bay Area as well as the Sacramento area and yet remains undeveloped. The land has a great value because of its undeveloped nature, as a peaceful sanctuary that is quickly reached from these major urban cores. The unspoiled vistas and quietness of this valley will be greatly impacted by the construction of an industrial wind park with miles of 428 ft. lighted, sound emitting turbines along the valley rim that will be visible from the majority of our property in Bear Valley. We are concerned that we will lose a great deal of property value, which will result in physical impacts to the environment due to lack of ability to keep the property in a good state, for example.

Raptors, Migratory Birds and Bats: Raptor species are known to be present in the area. Importantly, the AltaGas project brochure contains a map showing "bald eagle" near the project site—which perhaps indicates a nesting site. Golden eagles are common in the area and are regularly seen. It is well documented that wind turbines have a high

raptor mortality rate. As a result, the raptors (including the bald eagle and golden eagle) will experience significant negative impacts from operation of the turbines. Further, the construction of the wind farm itself will result in disturbance of habitat, etc., which also will negatively impact raptors.
Night flying migratory birds will be disoriented by this 3,300 – 3,900 ft high and miles long wall of FAA required aviation lighting in this now natural, dark area resulting in migratory bird mortality.

In addition to the high mortality rates for raptors, wind turbines also have a high mortality rate for bats, which are present in the area.

Special Status Wildlife Species: There are numerous wildlife species in the vicinity that may classify as special status species and could be affected by the project, such as from light and noise pollution (particularly nocturnal species), as well as through habitat disturbance, noise, increased traffic (wildlife kills on roads), etc.

Alternatives: It appears that AltaGas has performed an analysis of alternatives in the project Development Plan. However, this analysis does not address a reasonable range of alternatives. It only gives detailed consideration to a single alternative that is identical to the proposed project except that it would use different turbines (so it is essentially the same project but with a larger number of smaller turbines). A better evaluation of alternatives, both on- and off-site, needs to be undertaken given the sensitive nature of Bear Valley, which will be significantly impacted by the project.

Sincerely,

Ms. Lucille Penning

Ms. Catherine Townzen

CALIFORNIA
RANGELAND
Trust

October 13, 2010

Mr. Rich Burns, Manager
Bureau of Land Management
Ukiah Field Office
2550 North State Street
Ukiah, CA 95482

Via US Mail and e-mail to ukiahwindeis@ca.blm.gov

Re: AltaGas Walker Ridge Wind Power Project - EIS Notice of Preparation

Dear Mr. Burns:

The California Rangeland Trust appreciates the opportunity to comment on the scoping of the Environmental Impact Statement (EIS) for the above referenced project. The Rangeland Trust is a statewide conservation organization that holds conservation easements on nearly 200,000 acres, including an easement on the 13,000 acre Bear Valley Ranch adjacent to the project area.

The Rangeland Trust is not opposed to wind projects in general but does have significant concerns with the proposed location of the AltaGas project and we ask that the scope of the EIS includes several important issues that we believe are very important and need to be thoroughly analyzed.

Bear Valley is a priority conservation focus area for a number of land trusts and state agencies because of its very unique combination of conservation values including scenic viewshed, wildflowers, productive working landscapes and habitat for wildlife and plants including a number of state and federally listed species of flora and fauna. A number of ranch owners have seen the success of the Bear Valley conservation easement project and have expressed strong interest in placing easements on their private lands. This would create a virtual preserve in the area and would offer permanent protection to this unique region. We believe that because of the protected status of the Bear Valley Ranch, and potentially several other area ranches, there is a higher standard of protection of these lands in the project area. The impacts of a wind energy project of this magnitude will likely create a more serious set of impacts on these protected lands than on lands that do not meet this higher standard. We ask that the EIS recognize the protected status of the Bear Valley Ranch and the high potential for a landscape-level preserve in assessing the true impact of the wind project.

Since we started working on conservation projects in the valley, we have become aware that tourists from all over Northern California, and particularly the Bay Area, visit the area during the springtime to view the spectacular wildlife displays there. We ask that the EIS pay particular attention to the potential impacts to the viewshed from the wind towers and how the loss of the historic landscapes could cause not only degradation of these views but also economic losses to the local communities resulting from fewer tourists.

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We also have a concern about how the wind project could affect property values, which in turn impacts the value of conservation easements here. The value of the easements is a prime motivator to property owners to enter into these permanent conservation contracts and if those values are impaired, an argument could be made that fewer property owners would place easements on their land. Accordingly, we ask that the EIS examine this issue.

Thank you again for the opportunity to make these brief comments.

Sincerely,

Nita Vail
Chief Executive Officer

UKIAH FIELD OFFICE
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"Professor Peter Stiles of Keel University has completed tests in relation to a wind farm in Scotland and has found that infrasound vibrations are detected 10 kilmetres (6.2 miles) from the site of 60 metre turbines as soon as they start to generate. If the turbine has 3 blades (as is usual) and it turns at 20 revs per minute, then there will be a THUMP every second. Imagine 26 turbines all thumping away at once!"

Double Eagle Ranch is a residential community that has been in existence since 1971. Many of us have poured our hearts and souls into building our homes and our futures in a site removed from most of the noise and commotion of modern industrial life. Some residents have been here since the beginning. My wife and I have personally devoted the last 18 years to making a life in these hills. We have all put up with a tremendous amount of inconvenience, and extra work, in order to enjoy the peace and quiet that can only be found miles away from society's amenities.

Now we are being asked to literally bet our homes and our futures on the hope that the proposed wind farm on Walker Ridge will not have the effects that other wind farms have had on their neighbors. We have read about the devastating changes that neighbors have had to endure, and in several documented cases have been unable to endure, because of the noise generated by wind farms that drove them out of their homes.

While we are going to be betting our homes and futures, we wonder, if we lose will there be any compensation? Will the company's insurance cover our potential losses? Will there be any efforts to change the situation if it falls short of rendering our homes worthless and uninhabitable, but lowers the quality of our lives by essentially eliminating the quality that we moved out there to enjoy?

We assume that if we win this bet there will be no winnings. That if all goes well, we are not going to share in the profits, we will simply retain what we already have. If we lose the bet, will the company share in our losses?

"When wind farm developers do surveys to assess the suitability of a site, they measure the audible range of noise but never the infrasound measurement — the low frequency noise that causes vibrations that you can feel through your feet and chest. This frequency resonates with the human body — their effect being dependant on body shape. There are those on whom there is virtually no effect, but others for whom it is incredibly disturbing". Dr Amanda Harry

Will there be any effort to determine if the infrasound will affect our lives? If there is not and the infrasound does affect the changes that it has at other wind farms, what will be the response of the company? Will we receive any contractual guarantees protecting us from economic loss, and if so how will that be determined in a depressed housing market that most of us would not have entered willingly?

What about the boundaries on this project. I was told at the meeting in Colusa that the furthest south generator would be about 3 miles from my residence, but the project boundaries come much closer. Once this is approved would additional permission be required to build closer to us, or would that simply be the right of the company?

"Neighbor Mike Eaton, who also lives within a half-mile of a Willow Creek turbine, said the spinning blades are noisier than people realize. He's measured 67 decibels with a handheld monitor beside his home, he said, much higher than the 36 decibels allowed by state law.

Not only that, the retired furniture maker said, "I can hear windmills at my house from Arlington, 12 miles away."

Eaton, 61, said the turbines give him nausea by aggravating inner-ear and balance problems he's had since a 1966-67 tour in Vietnam subjected him to the constant pounding of an Army 155 mm artillery piece."

"I cannot live where I'm living now with these decibels and vibrations," he said."
Oregon wind farms whip up noise, health concerns

Published: Thursday, March 26, 2009, 9:00 PM Updated: Wednesday, September 30, 2009, 4:21 PM

Richard Cockle, The Oregonian

Noise travels all too well in the open dry air that surrounds us at Double Eagle Ranch. There is a generator, or some piece of machinery that is operated occasionally at the dam at Indian Valley Reservoir, that I can hear through my bedroom window at night. This is at a distance of approximately 3 miles. The above mentioned neighbor of a wind farm in Oregon reports hearing them at 12 miles, 4 times that distance.

Here are several questions;

1. Will there be any compensation if our homes are rendered unlivable and impossible to sell?

2. How would such compensation be determined? The housing market is very depressed right now and could be much worse in a few years. Would any such compensation take into consideration that if we entered into the market at our choice we would have the option of waiting for a recovery?

3. I was told that the furthest south turbine would be about 3 miles from my house – closer to other Double Eagle residents. The boundary of the project extends further south. Is there any additional procedure that would be required to

build closer to us later, or would that simply be left to the discretion of the company?

4. Will the sound evaluation focus entirely on decibels, or will it also consider what many people consider more important; infrasound vibrations?

5. If the damages fall short of rendering our homes unlivable and impossible to sell, but still are damaging to our quality of life, can we expect any mitigation, such as shutting the machines off at night, or switching to a quieter turbine or blade?

6. Will any assurances be given to us in contractual form, guaranteeing us compensation or mitigation in the event that we experience what other neighbors of wind farms have experienced?

These are potentially life altering, devastating changes that we are faced with. There is a fear that we will be given assurances of no impact, and then powerless to do anything about it if those assurances prove wrong. This would be extra painful since this project will be at least partially funded with our own tax dollars, going to a company from another country.

Which leads to our last questions;

7. Couldn't this be located further away from us?

8. Couldn't it be done with much quieter solar panels?

Thank you for reading this and considering our questions. We look forward to continuing dialogue in the future.

Glenn Goodman

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October 13, 2010

BLM Ukiah Field Office
Attention: Mr. Richard Burns
2550 North State Street
Ukiah, California 95482

via email: ukiahwindeis@ca.blm.gov

RE: Walker Ridge Wind Project scoping comments

Dear Mr. Burns:

The Redwood Chapter of the Sierra Club, the nation's largest and oldest environmental organization, represents more than 9000 Club members in northwestern California. The Chapter's geographic area includes Lake County, where the western portion of AltaGas Renewable Energy Pacific, Inc.'s proposed Walker Ridge Wind Project (CACA-49639) would be located.

Combating climate change is central to the mission of the Sierra Club, which strongly favors the development of renewable energy sources on appropriate sites, as part of a comprehensive national strategy to reduce greenhouse gas emissions and dependence on fossil fuels. The Club supports federal and state mandates to enhance renewable energy development (both in general and specifically on public lands), and to increase the proportion of renewable energy in the statewide portfolio, but as a matter of basic policy also believes that the costs and benefits of each such development must be assessed individually. That assessment must take into account both the potential value of the renewable resource and any resulting harm to the "ecological, scenic, natural, wildlife, geological, educational, or scientific value" of the site. Because of the many sensitive natural resources of Walker Ridge, the area's high conservation value, and its geological complexity, it is apparent that the Project has many potential impacts that require detailed and comprehensive environmental analysis.

Walker Ridge's true potential for wind energy production is also of great concern. It is impossible to conduct a valid cost benefit analysis without detailed information on the site's capacity to generate electric power, and hence its capacity to meet the governmental mandates mentioned above. Previous decisions by other power companies to abandon wind generation projects on this site indicate that the resource itself may be no more than marginal. AltaGas's willingness to move forward does not necessarily contradict this assessment, since public subsidies of various kinds are an integral component of any determinations of profitability. We therefore request that the company make the proprietary scientific data on which wind generation estimates are based available for public review. Access to this information will be particularly necessary if -- as seems probable -- the Environmental Impact Study (EIS) concludes that some significant and unavoidable impacts cannot be fully mitigated, and a finding of overriding considerations of public benefit must precede approval of the Project. Considering the Project's minimal capacity to provide long term employment or foster the economic welfare of neighboring communities, renewable energy production itself has to be the primary benefit under consideration.

Potentially significant areas of impact from the proposed Project include diverse biological resources, contamination of water resources, introduction of invasive species, fire ecology, esthetic considerations, and the wilderness characteristics of the site and surrounding area.

Biological resources
The Project has the potential to cause potentially significant impacts to many species of migratory birds. A study by Erickson et al. (2001, 2003) found that passerines comprise 78 percent of all avian fatalities (compared to waterfowl at 6 percent, raptors at 3 percent, and shorebirds at 2 percent. Walker Ridge may be a critical migration route for passerines, based on the frequency with which migration corridors follow ridgetops, and the site's location in the interior Coast Range, where research has shown that a major influx of long-distance migrants occurs in September and early October. Since bird migration patterns vary from year to year, appropriate investigation of the Ridge's status as a migratory route will require multi-year studies. Impacts to resident raptors also demand detailed examination. Both Golden and Bald Eagles as well as several species of hawks are known to inhabit the general area, and the Bureau of Land Management (BLM) regularly conducts hikes into the nearby Cache Creek Wilderness to give members of the public an opportunity to observe these iconic birds. The likelihood that both species of eagle use the ridge as foraging territory (whether or not nesting sites are found) is increased by the proximity of Indian Valley Reservoir; the possibility of harm to Golden Eagles is particularly problematic since the status of these birds precludes any legally permissible "incidental take" whatsoever.

Potential harm to bats also requires detailed evaluation. Studies should provide authoritative evidence of the presence of various species on the site, and mitigations must be included to lessen impacts. Since bat mortality is commonly caused not by collisions with the turbines but by devastating respiratory system impacts produced by changes in air pressure, revisions in project design to alleviate effects on birds (such as the construction of "dummy" towers at the ends of an array) would not necessarily reduce the loss of bat life.

In addition, Walker Ridge and the nearby Bear Creek corridor is a biological hotspot for dragonflies and damselflies, supporting nearly 50 percent of the known species in California, including *Anax Walshinghami* (Giant Darner), North America's largest dragonfly. The site is also home to at least five comparatively rare butterflies, which because of their tendency to gather on hilltops during the mating process may be particularly sensitive to wind power development. In the nearby Knoxville Wildlife Area the installation of small wind "test towers" harmed butterflies both by construction of the site footprint and by road widening. To be authoritative, studies of impacts on these insects must be carefully constructed, since observation opportunities are brief and vary from year to year depending on weather patterns.

Development of this area also has the potential to sever a vital wildlife corridor connecting the Klamath region and Mendocino National Forest to the Cache Creek Wilderness and Knoxville wildlife area. Analysis of this potential impact must of necessity include studies that go far beyond the project site itself.

Many sensitive serpentine-associated plant species and dependent fauna characterize this area, which the California Native Plant Society (CNPS) has recommended be designated an Area of Critical Environmental Concern (ACEC) because of its unusual botanical characteristics. Walker Ridge hosts more than 50 serpentine endemic plants, at least 23 special-status serpentine-associated plant species, and many unusual plant communities. This floral assemblage has never been studied comprehensively, and occurrences of special-status species are not yet fully known. Since botanists have observed dramatic annual floristic fluctuations (especially following fires), a single-year survey cannot adequately document botanical resources in the Project area.

The complexity and possible severity of biological impacts on Walker Ridge indicate that it should be classified as a Category 3 site, where the potential for wildlife impacts is high or uncertain, and where more than one year of pre-permitting studies is needed. Existing knowledge about year-to-year variation in many plant and animal populations in this region supports the conclusion that two years of pre-permitting study should be required at a very minimum. Nothing less would provide the authoritative baseline needed for future operations monitoring and impact assessment.

Contamination of Water Resources
Mercury and chromium are known to be present in this region, which contains a number of abandoned mines where remediation is ongoing. High asbestos content also characterizes the serpentine rocks and soils of Walker Ridge. All of these substances pose significant environmental risks that can include adverse effects on human health. Obvious potential exists for releasing air borne contaminants during the extensive grading needed to build energy tower pads and to widen the access road, and is of particular concern since the watersheds on both sides of the Ridge -- North Fork Cache Creek to the west and Bear Creek to the east -- have already been listed for mercury impairment. The concentrations of these hazardous substances must be evaluated during environmental review, and mitigations prescribed to reduce risks to Project workers both during construction and subsequently, to future recreational visitors passing through the site by automobile or by motorcycle, and to consumers of fish from the North Fork Cache Creek and Bear Creek systems. Activity-based air sampling should be conducted on Project site roads at different seasons and under different soil moisture conditions, with contaminant estimates based on the volume of soil that will be disturbed, rather than upon surface acreages. We recommend that a computer-generated three-dimensional portrayal of the site before and after construction be provided.

To minimize adverse effects on surrounding watersheds, implementation of effective erosion control methods must be specified, taking into account the difficulties of re-establishing vegetative cover on disturbed areas on the serpentine soils that predominate on the site. Although we strongly support the proposal to revegetate with "weed-free native grasses, forbs, shrubs, and topsoil salvaged from all excavations and construction activities" and "site seed mix" (POD 2.13.4), most of these native serpentine-adapted plants tend to be slow-growing and hard to establish, which will dramatically reduce their effectiveness in controlling erosion. Implementation of on-site reclamation methods must also specify plans to collect seeds and condition them for germination, and to collect and maintain native plants for re-planting later. It seems probable that an on-site nursery will have to be established.

Invasive Species
The extensive soil disturbance and intense vehicular access on the Project site during construction is certain to result in the introduction of unpredictable numbers and kinds of non-native weed species, and to promote the spread of those invasive plants that already may be present on the site. The comparatively pristine nature of Walker Ridge at the present time, and the rarity of its serpentine floral assemblage, makes appropriate mitigation of this lamentable but inevitable consequence imperative. A detailed mitigation monitoring plan for invasive species control is needed, including long-term plans that take into account both increased traffic on Walker Ridge Road and the continuing hospitality of the cleared areas around the bases of the towers to the establishment of invasives, and also including possible impacts of any herbicides that may be employed.

Fire Ecology
Fire is an essential element of the chaparral ecosystem that prevails in much of the Walker Ridge area, and the changed fire suppression protocol that would be required if the Project becomes operative is yet another subject that needs detailed evaluation. The Project Plan of Development (POD) specifies that a Fire Management Plan will be devised for project operations, but nothing has been said about management of fire hazards during the construction period, when continuous operation of heavy equipment in fire-prone wildlands during the dry season will create significant risks.

Esthetic Impacts
The Project would result in the construction of up to 42 200-foot towers on a major ridgeline in an undeveloped area. Although there are few residences in the immediate vicinity, noticeable impacts to the viewshed can be expected from Mt Konocti to the Sutter Buttes, with especially dramatic changes occurring at night. According to the 2006 BLM Resource Management Plan, "areas visible from Key Travel Routes and Key Observation Points are managed as VBM Class II for exterior observation points north, west, and southwest of Indian Valley Reservoir." The objective of Class II designation is "to retain the existing character of the landscape. The level of change to the

characteristic landscape should be low." Key Observation Points in Lake County include the newly acquired Mt Konocti County Park, the city of Lakeport, Clear Lake itself, and Pinnacle Rock -- all to the southwest of Walker Ridge. The Cache Creek Wilderness lies due south of the site, and the Snow Mountain Wilderness is located to the northwest. Plainly a detailed evaluation of visual impacts is needed, using protocols such as tethered balloons and computer mockups similar to those conducted on microwave tower construction proposals. Section 5.2.6 on visual mitigations makes no mention of ways to reduce the impacts of the FAA-required nighttime aviation lighting, and it seems unlikely that any reduction would be possible.

Wilderness Characteristics
The Walker Ridge region has been identified as a Citizens Proposed Wilderness Area, and both its wilderness characteristics and the possibility of eventual designation as Federal Wilderness must be taken into account before permitting development on the site. Proposals to avoid or mitigate impacts to these special values should be evaluated in a regional context, taking into consideration the site's central location in the proposed Berryessa Snow Mountain National Conservation Area, a special status that has received widespread support from local individuals and organizations. Fragmentation of this large contiguous natural area could cause repercussions ranging far beyond the site itself, and by reducing the resilience of the larger habitat impair the ability of many species to maintain their populations in the face of climate change.

Alternatives
The NEPA process requires the evaluation of Alternatives to the Project as proposed, including but not limited to the No Project alternative. In this case we recommend a formal reassessment of the Geysers alternative site, which as a geothermal energy producer has already been developed for industrial use, and is equipped with the transmission lines needed for economic viability. The POD states that wind power development in that location would be more environmentally damaging than at Walker Ridge because of the necessity for road construction, but that dismissal does not take into account the steepness of the terrain on Walker Ridge, and consequently extremely high level of disturbance required by necessary improvements to Walker Ridge Road, nor the comparative significance of damage to a pristine area versus one where natural values have already been substantially degraded.

Errata etc.
Section 1.1 describes a 7882 acre right of way, vs 8157 acres in 1.3.2.1.

The schedule provided in Section 1.1.2 proposes that NEPA review will begin in January 2010, but the public review period didn't actually start until August 2010. Does this change affect subsequent dates in the schedule?

Section 1.3.2.1: the Walker Ridge wind farm would "produce power on federal land near an existing load center (the San Francisco Bay area) . . . " Since the Bay Area is more than 100 miles distant from the Project site this determination seems debatable.

Section 1.3.3: the Walker Ridge "access road network . . . would require only minor modification," a conclusion that depends on an extremely flexible definition of "minor."

Table 1-4 states that Lake County building permits are regulated by the "public works department" instead of the Community Development Department.

Section 2.7.1 states that "base rock would be trucked in" for access road construction. What will be the source of this rock? Impacts will vary depending on the direction of traffic.

Section 3.1.2 states that no power purchase agreements are "currently in place," but that agreements are expected by July 2010. What is the current status?

Section 4.1 on operations predicts that "approximately two to three maintenance staff located in Clear Lake" will be the only permanent on-site employees. Presumably "Lake County" is meant, though workers would be just as likely to reside in Williams in Colusa County.

Table 5-1 deems the likelihood of Norris' Beard Moss to be "low" and "unlikely due to elevation," but this species occurs "between 600 and 1,975 meters," and project elevation is given as 3,500 feet (1075 meters). Discussing Bald Eagles, the same table states that "no nesting habitat [is] present in

the project area" while also stating that "nesting occurs in forested habitats within a few miles of coastlines or large freshwater bodies" -- such as Indian Valley Reservoir.

Figure 1. Clear Lake shown as a dot (like a town) rather than as a body of water: is the City of Clearlake meant? In any case the lake itself should be shown on this map, as should Lake Berryessa, Lake Pillsbury, and Indian Valley Reservoir.

The Redwood Chapter appreciates this opportunity to offer input on the Project environmental review, and looks forward to evaluating the EIS at a later date. Please keep us informed on any additional opportunities for public comment, and do not hesitate to contact me at any time with questions.

Yours sincerely,

Victoria Brandon
Redwood Chapter Vice Chair
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Comments for Walker Ridge Wind Generation Facility EIS

Craig Thomsen, Rangeland Ecologist
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The following issues should be addressed by the Walker Ridge Wind Generation Facility EIS:

Invasive Plants

Non-native, invasive plants are one of the major issues on BLM lands in the United States, damaging ecological, recreational, and scenic values. Invasive plants occur on Walker Ridge, and have great potential to spread with increased human disturbances; their expansion on this relatively weed free landscape would lead to irreversible changes, as well as increased public expenditures for management. For example, on BLM's Bear Creek Ranch near Walker Ridge, noxious weeds are a primary management concern, consuming large amounts of BLM staff time, associated stakeholder involvement, and public dollars that have been allocated for control projects.* One of the invasive plants of greatest concern is barbed goatgrass (*Aegilops triuncialis*), a weed that continues to expand on the Ranch, despite many control efforts, including prescribed burning, livestock grazing, mowing, and herbicide applications.

Barbed goatgrass is also a serious noxious weed in Bear Valley, which is the probable seed source of the known infestations occurring at the northern end of Walker Ridge along Brim Road. Although its occurrence on Walker Ridge is now limited, barbed goatgrass is poised to rapidly expand should greater disturbance occur there, especially given its proven ability to grow and persist on serpentine substrates.

Invasive plants often spread along lines of travel such as roads, and weed invasion is typically facilitated by ground disturbance. For example, if seed from an infested site is moved to another site from road grading, the deposited seed (s) will grow and effectively expand the infestation. Once established, infestations are very difficult to eradicate and can more easily spread to adjacent lands.

Instead of the "500 acres" that wind energy proponents point to as the project "footprint," the post-project disturbance effects could potentially extend to many thousands of acres, due to the nature of invasive plant colonization and subsequent expansion onto adjacent lands. Therefore, the EIS should address the following:

1) The current distribution of barbed goatgrass on lands that will be disturbed on Walker Ridge.
2) Measures that will be taken to prevent barbed goatgrass seed from being moved from one site to another on the Ridge as a result of construction activities.

3) Measures that will be taken to prevent weed seed (barbed goatgrass or otherwise) to be brought in from elsewhere, i.e., as "hitch-hikers" on construction equipment and other vehicles.
4) The procedures for post-construction surveys that will be done to detect new weed infestations.
5) What measures will be taken to address new infestations when weeds are found.
6) Who will conduct the work and what management structure will be set up to address new infestations that will likely result from construction activities.
7) What control methods will be used and what effects will these methods have on the resident native flora.
8) How long will control measures be in place to insure that new weed infestations will be eradicated.
10) Who will pay for the control work.

These same set of EIS considerations should be applied to other non-native invasive plants that will be favored by ground disturbances on Walker Ridge.

(Please note that these questions stem from 25 years of working with invasive plants, in both an applied research and land management capacity, 12 of which include work on BLM lands and elsewhere in the Bear Creek watershed. Over an eight year period, I tried (*unsuccessfully*) to eradicate this plant on the Bear Creek Botanical Management Area, a spectacular serpentine prairie remnant that occurs on the Caltrans right-of-way strip along Highway 20. This work was done in collaboration with Caltrans, BLM, California Dept. of Forestry and Fire protection, and many volunteers, using combinations of prescribed burning, mowing and hand pulling. The only options for controlling new infestations on Walker Ridge that I can foresee would be either herbicide applications or removal by hand. However, it can not be emphasized strongly enough that prevention is the first line of defense in addressing invasive plants).

*Thomsen, C.D., E. A. Dean, G. J. Mangan, G. G. Harrington, J. R. Alderson, J. L. Tuil, and J. F. Weigand, *In press.* Invasive plant management for native plant conservation on BLM's Bear Creek Ranch, Cache Creek Natural Area. *Proceedings*: California Native Plant Society Conservation Conference, Sacramento, Jan. 2009.

Scenic Values
Walker Ridge has spectacular scenic values, something that should be considered in the EIS. For example, in an article* that discusses Bear Valley and Walker Ridge, Dr. Steve Edwards, Director of the Tildon Park Botanic Garden, explains how this wild mountain range, (i.e., Walker Ridge) provides "breathtaking views of Bear Valley, Sutter Buttes, and the Sierra to the east: Mendocino National Forest (Snow Mountain and Mt. St John) to the north; and Lake and Napa counties (Mt. Konocti, Mt. Hannah, Cobb Mountain, Mt. St. Helena) to the west." In addition to how these and other views will be affected by wind towers from Walker Ridge, the EIS should also consider how the viewshed will affect the scenic qualities on adjacent public and private lands as one looks towards Walker Ridge from other areas.

*Edwards, S. 1993. Bear Valley: Wildflowers as John Muir Described Them"), Fremontia Vol. 22(3):12-16.

Multi-year Botanical Inventories

As someone who has spent over a decade in the Bear Creek watershed, and observed the vegetation from a botanist's perspective, I must stress the importance of conducting multi-year surveys to adequately document the flora of this area. Floristic expression changes from year to year, something that is dependent on climate and other ecological processes. This is especially true for annual plants, but the 2008 Walker Fire, which coincided with favorable rainfall years, provided many examples of enormous year to year variation with biennials and perennial species that grow there too.

For example, in spring of 2009, Walker Ridge exploded with many herbaceous species that are not typically seen in unburned areas. One of these was the true fire-follower, whispering bells (*Emmenanthe penduliflora*), which carpeted hillslopes, ravines and flats in formerly chamise-dominated landscapes. In spring, 2010, whispering bells was rare on the Ridge, diminishing to a hard-to-find species. Miner's lettuce (*Montia parviflora*) was another annual that grew profusely in 2009 but then dropped to low numbers in 2010.

On the other hand, wooly sunflower (*Eriophyllum lanatum*), which was rarely seen in 2009, formed massive flower displays in 2010 on shrub-dominated slopes that had been burned. Year 2010 brought other botanical surprises that were not observed the previous year: Locally abundant stands of lotus (*Lotus grandiflorus*), occurrences of golden eardrops (*Dicentra chrysantha*), and large patches of prickly poppy (*Argemone munita*) were prominent in places where they hadn't previously been seen. Also, more native thistles were seen flowering in spring 2010, including *Cirsium cymosum* and *Cirsium occidentale*. This is just a few examples, but for many other species, Year 2010 was also very different than 2009, and even greater differences are evident if compared to pre-burn conditions. One can only wonder what 2011 will bring.

The EIS should ensure that multi-year inventories are conducted to capture the full expression of plants in and around the proposed project areas. In addition to the botanical changes observed over the years, the 2008 Walker Fire also demonstrates the need to consider the potential fire-follower flora that would go undetected in surveys on non-burned sites, including rare plants. Following the fire, sites that were previously dominated by dense, woody stands of chamise, serpentine and non-serpentine chaparral, and McNab cypress, exploded into a profusion of herbaceous, spring-flowering plants.

Multi-year Wildlife Inventories and Types of Surveys

Similar to botanical inventories, the EIS should conduct multi-year wildlife inventories to make scientifically valid decisions about the long-term wildlife impacts from an industrial wind energy development.

At the request of Rich Burns from the BLM-Ukiah district office, I was asked to be one of the co-reviewers of the "Biological Resources Work Plan for Walker Ridge Wind Energy Project," submitted by Ecology and Environment Inc. to BLM. To help

accomplish this task, we solicited comments from expert ornithologists and wildlife biologists. I don't know if our suggestions were incorporated into the existing work plan and planned EIS, so I will re-state two of them here.

"One year of utilization surveys may not represent inter-annual variation in bird and bat abundance: several years of surveys for use as a baseline are recommended (Smallwood et al. 2009)*. No peer-reviewed publications have supported the conclusion that one year of bird or bat use surveys would adequately represent a baseline. The same is likely true of bat surveys.

Smallwood, K.S., L. Rugge, and M.L. Morrison, 2009. Influence of Behavior on Bird Mortality in Wind Energy Developments. Journal of Wildlife Management.

"A third expert argued that Walker Ridge should be classified as a Category 3 site—having high or uncertain potential for wildlife impacts under the California Energy Commission's California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development. This status potentially calls for more than one year of pre-permitting studies, given what is know about year-to-year variation in many plant and animal populations in the region. Two years of pre-permitting study would provide a more robust baseline for future operations monitoring and impact assessment, and adaptive management."

During a field trip (June 2010) sponsored by the Blue Ridge Berryessa Natural Area Conservation Partnership, I asked the lead wildlife biologist and Project Manager from Energy and Environment, Inc., Dr. Dave Plumpton, whether he thought a one-year survey was adequate for baseline bird and other wildlife studies. He answered that it would take 14 years to provide a statistically valid baseline sample.

Finally, given the effort that went into providing our comments for the Biological Resources Work Plan—at the request by BLM, including detailed comments by a range of outside experts, the EIS should address the many recommendations that were made in the review regarding the types of wildlife surveys needed for scientific validity. These comments were submitted to Ecology and Environment, Inc. and BLM, July 31, 2009.

Regional Conservation Values

The EIS should also consider the effects of wind energy development on Walker Ridge on the ecological values of the surrounding areas mentioned above, especially Bear Valley. In the article referenced above (see Scenic Values), Dr. Steve Edwards also discussed a proposed retirement community proposed for Bear Valley. He writes: "if a huge proposed development is to be placed in Bear Valley, the effects on Walker Ridge must also be considered. Many of the most diverse and colorful displays are in and around small, isolated vernally moist meadows. These can withstand only limited human impacts, not the ORV's and off-road non-ORV's that inevitably flood delicate areas next to developments. But Walker Ridge also holds immense value in relation to Bear Valley. For, if the latter can be preserved for future generations, it will be together with Walker

Ridge—which already belongs to BLM. Together they constitute *one of the truly greatest natural areas of California*. And it is only two hours by car from the Bay Area."

Through many years of hard work by the American Land Conservancy, and 1.5 million dollars of public and private funds, Bear Valley's scenic and botanical values were protected under a conservation easement. This investment is now threatened. The EIS should address this threat and provide mitigation measures, including a "no development alternative."

In addition to Bear Valley—with its renowned wildflower fields that are visited by thousands of people annually, Walker Ridge is in close proximity to the following significant landscapes:

- *BLM's Bear Creek Ranch*—12,000 acres within the "*Cache Creek Natural Area"* between Hwy 20 and Hwy 16 to Lake County line that includes important habitat for area wildlife.
- *Cache Creek Wilderness Area* within the *"Cache Creek Natural Area*:" BLM lands, immediately south of Walker Ridge (separated by Highway 20) that provides important habitat connectivity to Walker Ridge.
- *Audubon-designated "Clear Lake Important Bird Area"*— Five miles to the east and a major destination for northwestern CA birds.
- *Knoxville Recreation Area*—BLM lands, about 10 miles south.
- *McLaughlin Reserve*: part of the UC Natural Reserve System about 12 miles south.
- *Mendocino National Forest and Klamath Region:* Walker Ridge provides key habitat connectivity to these areas to the north and the *Cache Creek Natural Area* and other lands to the south.

Therefore, the EIS should consider the role of Walker Ridge as an important wildlife corridor of unbroken natural habitat, providing connectivity to many of these surrounding protected areas.

The value of Walker Ridge and the need for comprehensive inventories and conservation planning are further emphasized in the following example, taken from the 2010 BLM document, "Stewardship for Bear Creek Watershed: Priorities 2010-2014," an adjunct document that accompanied the Bear Creek Watershed Assessment (Weigand and Thomsen 2010).

"The Bear Creek watershed is known for its ecological value, including many rare and unusual plants and animals, although information gaps about the biological resources still remain. Moreover, site-specific conservation plans for most areas are lacking. Significant portions of the watershed have yet to receive thorough botanical and wildlife surveys. Because future land uses could affect these natural resources, it is imperative that land owners and public land managers understand what exists to insure that important ecological features are protected as changes in land use are being considered.

Conservation planning entails landscape-level and site-specific management prescriptions designed to protect the full range of plants, animals, communities, ecological processes, and ecosystem services present within landscapes. With threats by invasive species, head-cutting in wetlands, soil erosion, certain livestock grazing practices, OHV activity, catastrophic wildfire, energy development, and climate change, conservation planning on public lands is necessary to prioritize areas of highest ecological value and to take the necessary actions to help insure that such areas receive recognition and protection. The period between 2010 and 2014 focuses on inventories and conservation planning for three public land areas within the watershed: Walker Ridge, Mill Creek subwatershed, and the Bear Creek Ranch…The proposed wind energy development for Walker Ridge makes comprehensive biological inventories and conservation planning a high priority, before further disturbances take place; significant plants, wildlife species, habitat, and landscape corridors exist on Walker Ridge that need thorough documentation."

Thank you for the opportunity to provide these comments.

Sincerely,

Craig Thomsen

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October 23, 2010

Via email and U.S. Mail

Rich Burns, Ukiah Field Office Manager
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ukiahwindeis@ca.blm.gov

Re: Comments on the Notice of Intent To Prepare an Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Mr. Burns,
Please accept and fully consider these comments submitted on behalf of The California Native Plant Society regarding the development of a draft Environmental Impact Statement (DEIS) for the proposed AltaGas Renewable Energy Pacific, Inc.'s (AltaGas's) proposed Walker Ridge Wind Project (CACA-49639).

The mission of The California Native Plant Society (CNPS) is to conserve California native plants and their natural habitats. CNPS supports renewable energy generation when appropriately sited. We hope the DIES process for this project will produce an environmental analysis that allows for the development of renewable energy resources in a manner and place that protects existing, intact, sensitive habitats.

We offer these comments while supporting and incorporating herein by reference the comments submitted in separate letters by the CNPS Sanhedrin Chapter, CNPS Sacramento Valley Chapter, and by a coalition of conservation groups including CNPS. More specifically, we would like to offer the following recommendations regarding the development of the DEIS for this project:

1. Develop management prescriptions for the Walker Ridge ACEC and determine how they will be addressed in conjunction with the DEIS.
In 2005, CNPS submitted a petition to BLM to establish an ACEC designation for Walker Ridge in order to protect the significant botanical resources associated with the entire ridge. In responses to comments to the Ukiah RMP DEIS, BLM stated:

> *BLM will develop a Walker Ridge ACEC activity plan that will provide more specific management for the ACEC. [The CNPS] detailed proposal will be further addressed during development of said activity plan.* (2006 Ukiah RMP DEIS Chapter 5.3.3.5, Response #18-2)

What is the status of the Walker Ridge ACEC activity plan, and what is the process by which the ACEC management prescriptions associated with said plan have been or will be developed? These questions are relevant to the development of the DEIS because the DEIS must provide an assessment of the affected environment, including management measures associated with the proposed project site. CNPS recommends that the ACEC plan be developed through a public

process whereby CNPS and others can provide input regarding the scope, biological objectives, and management measures of the plan.

How will the ACEC activity plan integrate with the development of the DEIS? All parcels of the Walker Ridge ACEC are located either partially or entirely within the proposed project right of way (ROW). There is therefore a high probability that ground-disturbing activities and indirect impacts associated with the proposed project's construction, operational, and decommissioning phases will affect the Walker Ridge ACEC areas. It is premature for BLM to assess impacts to the ACEC areas in the DEIS before a plan which details management prescriptions for the ACEC areas has been completed.

Recommendation:
CNPS recommends that prior to initiating the DEIS, BLM complete an ACEC activity plan that provides specific management prescriptions for the Walker Ridge ACEC.

CNPS also recommends that the DEIS analyze as a Project Alternative a revision of the current ACEC boundaries to extend to the area originally proposed in the 2005 ACEC petition to protect the sensitive botanical resources that occur on the top and side slopes of Walker Ridge. The same Relevance and Importance rationale used to identify the current ACEC areas (occurrences of globally imperiled plant taxa with restricted growth conditions) are applicable over the entire Walker Ridge area.

2. Additional and appropriately performed surveys for Special Status Plants and Natural Communities are necessary.
An analysis of the affected environment based solely on the botanical resource map and table provided in the POD would be incomplete and insufficient. The applicant's special status plant occurrence and vegetation layer map provided in the Plan Of Development (POD) is lacking a complete census of easily accessible California Natural Diversity Database (CNDDB) occurrences of California Rare Plant Rank (CRPR) 1B plant taxa (CRPR 1B taxa are plants formerly known as CNPS List 1B taxa). All CRPR 1B taxa are considered sensitive plant species and are included as BLM Special Status plants for which appropriate surveys must be performed and impacts determined in the DEIS.

There are special status plants whose occurrence within the proposed project boundaries are confirmed in the CNDDB dataset yet are identified in Table 5-1 of the POD as having "low" to "low-medium" potential of occurring within the project site. What's more, there are rare natural vegetation communities known to occur on Walker Ridge whose area of coverage are finer than what can be resolved by the vegetation layer map provided in the POD.

Recommendation:
Botanical surveys should follow BLM protocols outlined in *Survey Protocols Required for NEPA/ESA Compliance for BLM Special Status Plant Species* (BLM 2009). This project will require full floristic surveys to be performed at the "Complete Survey" level of intensity as defined by BLM plant survey protocols (BLM 2009), based on the level of disturbance associated with wind energy projects and the probability of special status plants occurring on the project site (BLM Special Status Plant Management Manual Handbook H-6840-1). Additional survey protocols for rare natural communities and other special status plants should follow the California Department of Fish & Game (CA DFG) *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CA DFG, November 2009), as per BLM's Memorandum of Understanding with CA DFG to provide information to the CNDDB:

BLM is party to a Memorandum of Understanding with the California Department of Fish and Game to collect information for inclusion in the California Natural Diversity Data Base. Therefore, in addition to inventorying for plants formally recognized as special status species by BLM, contractors must also inventory for all plant, lichen, and fungi species recognized as "special" by the California Natural Diversity Data Base (http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPPlants.pdf). (BLM 2009)

3. To what degree will project feasibility depend on public subsidies?
The proposed AltaGas project represents the sixth attempt to establish a wind farm on Walker Ridge. Marginal wind resource availability at this site has played a role in the previous five wind project ROW applications being withdrawn from Walker Ridge. To what extent will public funding through federal and/or state subsidies play a role in the financial feasibility of the sixth attempt to finance a wind farm on Walker Ridge?

Recommendation:
As part of the project feasibility assessment, the DEIS should analyze the overall funding, costs, and return on investment to the applicant relating to this project, and on what financial assumptions and agreements these factors depend. This type of information will assist BLM and the general public to decide whether and to what degree the dependence on public subsidies and the use of public lands applied to make this project financially viable outweigh the long term, permanent environmental impacts associated with this project.

We appreciate the opportunity to provide DEIS scoping comments for the proposed AltaGas Walker Ridge wind project. CNPS will continue to remain actively involved throughout all phases of this project's planning effort.

Sincerely,

Greg Suba

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Attachments:
- *2005 CNPS Walker Ridge ACEC Petition*
- *Survey Protocols Required for NEPA/ESA Compliance for BLM Special Status Plant Species*
- *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CA DFG, November 2009)
- *BLM Special Status Plant Management Manual Handbook H-6840-1*

Dedicated to the preservation of California native flora

ATTACHMENTS

2005 CNPS Walker Ridge ACEC Petition

Survey Protocols Required for NEPA/ESA Compliance for BLM Special Status Plant Species

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CA DFG, November 2009)

BLM Special Status Plant Management Manual Handbook H-6840-1

Significant Environmental Resources and Values of the Walker Ridge Public Lands:

A Nomination to the U. S. Bureau of Land Management (Ukiah Field Office) for Area of Critical Environmental Concern (ACEC) Status

October 27, 2005

Submitted by: Sacramento Chapter of the California Native Plant Society

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Summary

This proposal nominates the public lands along Walker Ridge for status as an Area of Critical Environmental Concern (ACEC). These lands are located along the boundary between Lake and Colusa Counties and are roughly 30 square miles in extent. This nomination describes the significant environmental resources and values of these lands, and the need for special management attention. These resources include a high diversity of plant species, serpentine-associated plant species, special-status plants, potentially undescribed plant taxa, unusual plant associations and its ecosystem significance as the watershed of Bear Valley. The public lands along Walker Ridge also have significant educational, recreational and scenic values because of their diverse flora and vegetation, accessibility and proximity to the floor of Bear Valley. These resources and values require special management attention, particularly as many current and potential future uses of these lands are not necessarily compatible with conservation of these resources and values. Thus, designation as an ACEC is merited.

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Introduction

Overview of ACEC Designation

Areas of Critical Environmental Concern (ACECs) are defined as areas within the public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and safety from natural hazards. The identification of a potential ACEC does not, in itself, change or prevent change of the management or use of public lands (43 CFR 1601.0-5). On Bureau of Land Management (BLM) Lands, ACEC designation indicates to the public that BLM recognizes that an area has significant values and has established special management measures to protect those values (BLM Manual 1613).

The Bureau of Land Management may consider an area for ACEC status if the criteria of relevance and importance are met. Relevance is defined as the presence of significant environmental "value, resource, system, process or hazard." Importance is the "more than local significance" and the "special worth, consequence, meaning, distinctiveness, or cause for concern" of this relevant resource or value (43 CFR 1610.7-2).

The identification and designation process for ACECs is further discussed by Schoolcraft (1987).

Overview of this Documentation and Supporting Documents

Walker Ridge is a north-south trending ridge serving as the boundary between Colusa and Lake Counties. In this proposal, the area referred to as the Walker Ridge Public Lands consists of BLM lands east of Indian Valley, west of Bear Valley, north of State Highway 20, and south of Kilpepper Creek. These lands occupy roughly 30 square miles. Figure 1 displays the location of this area.

This nomination describes some of the outstanding environmental values and resources of the Walker Ridge public lands, and how these values satisfy the criteria under which BLM may grant ACEC designations. This nomination also discusses the potential of the Walker Ridge public lands for RNA status.

Attached to this nomination are the following supporting documents:

1) Letters from four scientists and environmental leaders regarding the management of Walker Ridge (Appendix A). These letters are included as a demonstration of strong and well-informed support for the type of management emphasis that ACEC status would imply. The letters also demonstrate the need for special management attention for environmental values at Walker Ridge.

2) Plant species lists compiled during numerous trips by faculty and students from Humboldt State University, University of California Davis, and by the

Davis Botanical Society and the Sacramento Chapter of the California Native Plant Society (Appendix B). These species lists not only indicate the high level of biodiversity and the presence of unusual plant associations and of rare and threatened species, but also are evidence of the educational, scientific and recreational value that the flora and vegetation of Walker Ridge has for the greater region and the state.

These letters and species lists also are substantial new information and evidence about the environmental relevance and importance of Walker Ridge. This proposal also draws on other substantial new information in the form of GIS data layers, species distribution records and the observations of professional botanists.

Significant Environmental Resources and Values of Walker Ridge

This section of the proposal describes separately the significant environmental resources and the significant societal values of these resources. The significant environmental resources of the Walker Ridge lands include a high diversity of vascular plants, numerous serpentine-associated plant species, special-status plant species, potentially undescribed plant species, unusual plant associations and being the watershed of Bear Valley, an immediately adjacent focus of large-scale state and private conservation efforts. The significant values of the Walker Ridge lands include educational, recreational and scenic values.

Significant Environmental Resources

The environmental resources of Walker Ridge are only partially documented. No inventories have been compiled of its fungi, bryophytes, invertebrates or wildlife species. Its botanical resources, however, have been partially inventoried, are very diverse and together with the uniqueness of its underlying geology, these plant resources suggest that Walker Ridge also supports a high diversity of other organisms. The plant resources of Walker Ridge are described further in the following sections.

High Diversity of Plant Species

Although no comprehensive botanical inventory of Walker Ridge, its botanical resources have been partially documented by botanists, and include numerous species. (There are roughly 400 vascular plant taxa at Walker Ridge and its immediate surroundings [Appendices A–C; Clark and Magney 1995]).

The diversity of Walker Ridge is due to several factors. These factors include: diversity of underlying substrate, a range of elevations and geographic location. The ridgeline of Walker Ridge is one of the most southerly and eastern of the inner north coast ranges. It provides higher elevation terrain underlain by serpentine and sedimentary rock, and numerous rock outcrops, seeps, ravines and ephemeral and intermittent streams along its flanks. All of these features provide distinct microenvironments, many of which are absent from the surrounding region. Consequently, numerous species are present and many are at the limits of their geographical range (e.g., California nutmeg [*Torreya californica*], spice bush [*Calycanthus occidentalis*] and western azalea [*Rhododendron occidentale*]).

Serpentine-associated Plant Species

A substantial component of the plant diversity at Walker Ridge is associated with serpentinite-derived soils. Many of these are unusual, uncommon or rare

species. Comparing the plant list in Appendix B for Walker Ridge and its surroundings with the serpentine endemic and indicator lists of Kruckeberg (1984) and Safford et al. (2005) reveals that about a quarter of the flora (over 100 plant taxa) are serpentine-associated species. Of these species, about sixty are serpentine endemics, including Sargent and McNab cypress (*Cupressus sargentii* and *C. macnabiana*, respectively), Jepson's ceanothus (Ceanothus jepsonii), Congdon's silk-tassle (Garrya congdonii), serpentine willow (*Salix breweri*), Brewer's jewel flower (*Streptanthus breweri* var.s *breweri* and *hesperidus*), Jepson's milkvetch (*Astragalus rattanii* var. *jepsonianus*), four-petalled pussypaws (*Calyptridium quadripetalum*), serpentine sedge (*Carex serratodens*) and serpentine onion (*Allium falcifolium*). An additional 40–50 uncommon taxa at Walker Ridge are less strictly associated with serpentine and are best considered indicators of serpentine substrates.

These serpentine-associated species also form unusual plant assemblages. The seeps, rock outcrops and intermittent drainages support particularly distinct species assemblages, and these assemblages differ substantially among these locations (e.g., among seeps).

Special-status Plants

Of the uncommon and rare plants along Walker Ridge, several are special-status species and additional special-status species also may be present (CNDDB 2004). Special-status species reported at Walker Ridge include:

- Jepson's milk-vetch (*Astragalus rattanii* var. *jepsonianus*) (Federal Species of Concern, California Native Plant Society [CNPS] List 1B),
- big-scale balsam root (*Balsamorhiza macrolepis* var. *macrolepis*) (Federal Species of Concern, CNPS List 1B),
- Indian Valley brodiaea (*Brodiaea coronaria* ssp. *rosea*) (Federal Species of Concern, California Endangered and CNPS List 1B),
- pink creamsacs (*Castilleja rubicundula* ssp. *rubicundula*) (Federal Species of Concern, CNPS List 1B),
- adobe-lily (*Fritillaria pluriflora*) (Federal Species of Concern, CNPS List 1B),
- Hall's harmonia (*Harmonia hallii*) (Federal Species of Concern, CNPS List 1B), and
- Colusa layia (*Layia septentrionalis*) (Federal Species of Concern, CNPS List 1B).

Additional special-status plant species that may be present at Walker Ridge include:

- Snow Mountain buckwheat (*Eriogonum nervulosum*) (Federal Species of Concern, CNPS List 1B),
- drymaria-like western flax (*Hesperolinon drymarioides*) (Federal Species of Concern, CNPS List 1B),
- Morrison's jewel flower (*Streptanthus morrisonii*) (Federal Species of Concern, CNPS List 1B).

These plant species occur nearby in habitats similar to those present on Walker Ridge or have been reported from unspecified locations on Walker Ridge.

Incompatible management of Walker Ridge would contribute to further declines of these species, and increase their likelihood of federal or state listing as threatened or endangered.

Potentially Undescribed Plant Taxa

Serpentine areas, like those along Walker Ridge, are important reservoirs of plant diversity, and their endemic flora has not been fully described. In California, new serpentine-associated vascular plants are described almost every year. Recent examples include *Carex serpentinicola*, *Harmonia guggolziorum* and *Silene serpentinicola* (Zika et al. 1998; Baldwin 2001; Nelson and Nelson 2004).

Along Walker Ridge, several plants deserve a closer examination by botanists to clarify their identity, and to determine if they could be undescribed taxa. For example, on Walker Ridge, there are plants in the genera *Linanthus* and *Streptanthus* that do not key to or clearly fit the descriptions of the described taxa in those genera (E. Dean, UC Davis Herbarium, pers. comm., 2-21-04).

Unusual Plant Associations

The vegetation of Walker Ridge is extremely varied, particularly along the ridgeline, and includes outstanding examples of a number of distinctive or unusual plant associations. For example, there are extensive stands of Sargent's cypress (*Cupressus sargentii*) (e.g., at UTM 10 S 0545125 E 4325092 WGS 84), stands of knobcone pine (*Pinus attenuata*) and patches of chaparral dominated by and including a variety of species including Jepson's ceanothus, five different oaks (and some unusual hybrids of those species, as near UTM 10 S 0544463 4326733) and over 30 other species of trees and shrubs. Although botanists have reported the presence of these and numerous other associations, the plant associations of Walker Ridge have not been formally described or inventoried; such research would be very worthwhile for the management of these lands.

Ecosystem Significance as the Watershed of Bear Valley

The Walker Ridge lands have ecosystem significance as the watershed of Bear Creek in Bear Valley. The private lands adjacent to Walker Ridge on the floor of Bear Valley are under conservation easements to conserve their environmental resources and values. Not only are the Walker Ridge lands a substantial component of the watershed from which water and materials enter Bear Valley, but numerous plant and animal populations extend across both Walker Ridge and Bear Valley. These ecosystem connections are significant, particularly as conservation of Bear Valley was intended, in large part, to be watershed conservation. In fact, the California Wildlife Conservation Board contributed to the acquisition of conservation easements in Bear Valley because of its significance as a watershed and because the large private land holdings and BLM land holdings made effective conservation possible (CDFG 2001). The significance of the Walker Ridge lands due to their proximity to Bear Valley is discussed further in the Environmental Values section of this proposal.

Significant Environmental Values

Significant Educational Value

The combination of its diverse flora, road access, and geographic location relative to cities in both the Sacramento and Bay areas, has made Walker Ridge a frequent field trip destination for environmental education. Several universities (e.g., Humboldt State University, University of California Davis), botanical groups (e.g., Davis Botanical Society, California Native Plant Society) and others (e.g., Faulks 2004) sponsor or lead trips to Walker Ridge for environmental education. Appendix B contains examples of plant lists compiled by these visits over the last 15–20 years. Plant collectors also have regularly visited Walker Ridge to collect materials for educational events and university courses (J. Hunter, pers. comm.).

Significant Recreational and Scenic Values

The Walker Ridge lands provide numerous recreational opportunities for activities as varied as hiking, recreational shooting, bird watching, plant observation and off-road vehicle riding. But, it is their proximity to, and accessibility from, Bear Valley and Highway 20 that gives the Walker Ridge lands recreational and scenic values of more than local significance. .

Since the late 1990s, about 15,000 acres of the private lands adjacent to Walker Ridge have been conserved by the American Land Conservancy, California Wildlife Conservation Board, The David and Lucile Packard Foundation and the California Rangeland Trust (ALC 2005). These lands are a destination for visitors not only from the region but also from throughout the state and nation (Game and Lyon 1996; ALC 2005).

The primary attraction is the spring wildflower bloom, which draws plant and photography enthusiasts from throughout the state and nation. This recreational use is supported by a wildflower “hotline”, a guidebook funded by numerous organizations (including Sunsweet Growers Inc., Sierra Nevada Brewing Company, Inc. and the Yuba-Sutter Appeal-Democrat), and numerous websites and articles describing the valley and providing advice for visiting the region (ALC 2005; Leigh 2005; Campbell 2005; Photoquest.com 2005; Phillips 1998; Game and Lyon 1996). These publications and websites address a national audience and describe Bear Valley and its surroundings as one of California’s best wildflower displays, and even as “one of the most spectacular wildflower displays in the world” (Game & Lyon 1996).

Many tourists travel along and recreate on Walker Ridge in conjunction with their visits to Bear Valley. Walker Ridge has recreational values that complement those of Bear Valley, and strengthen the region as a destination for recreation. By driving along Walker Ridge, visitors can make a loop drive from Highway 20 through Bear Valley, and then up and along Walker Ridge back to Highway 20. Unlike Bear Valley, Walker Ridge provides opportunities for hiking and picnicking, including visits to hot springs and abandoned mines, and spectacular views of Bear Valley, the Sutter Buttes, Indian Valley Reservoir, Snow Mountain and even Mt. Lassen. It also provides an opportunity for visitors to view many

uncommon plants and animals that do not occur on the floor of Bear Valley; in fact, many photographs of “Bear Valley wildflowers” in guidebooks and articles are of plants that do not grow in Bear Valley but do grow on Walker Ridge, indicating the use of Walker Ridge by Bear Valley visitors, and that many visitors do not make a distinction between these two portions of this watershed.

The visual values of the Walker Ridge lands have greater than local significance because of their prominence in many Bear Valley views. Walker Ridge is part of the landscape being photographed in Bear Valley, which draws photographers from through out the state and nation each spring. Many of these visitors are also taking photographs on Walker Ridge as well.

Analysis of the Applicability of ACEC Criteria

Relevance and Importance

Several resources or values of the Walker Ridge public lands described in this proposal are relevant to its potential as an ACEC, because they constitute a significant environmental "value, resource, system, process or hazard". Several of these resources or values are important because they have "more than local significance" and "special worth, consequence, meaning, distinctiveness, or cause for concern."

The relevance criterion is met by the existence at Walker Ridge of a distinctive flora and unusual vegetation, and because it constitutes a substantial portion of an ecologically significant watershed. Importantly, these are landscape-scale attributes. These resources cannot be reduced to a series of dots on maps or conserved simply as a set of fenced locations.

The importance criterion is met by demonstrating greater than local significance, and/or rarity and fragility. Resources and values that meet the importance criterion include the regional (i.e., northern California) and statewide educational and recreational value of the Walker Ridge ecosystem, the uniqueness and fragility of its vegetation, and its ecological connections to Bear Valley, a major focus of State government and nation- and state-wide conservation organizations.

Need for special management attention

The need for special management attention for a potential ACEC is based on its conditions and trends, the relationship of its environmental values to other resources and activities, and the opportunities for its protection and restoration if it is so designated. These issues are addressed in the following section.

Predominant present activities are hiking, ORV use, recreational shooting, environmental education, bird watching and other nature observation, operation of telecommunication facilities and use as a travel route to Indian Valley or Bear Valley. Future uses could include more extensive development of infrastructure and other facilities for recreational visitor use, transportation, telecommunications and wind energy.

There is a need for management attention because several of the current or possible future uses could potentially conflict with each other, and may be incompatible with conserving the resources and values of Walker Ridge. Furthermore, conditions and trends by many observers are considered to be deteriorating.

Serpentine areas, particularly wet areas and barrens, are fragile environments that recover slowly from severe disturbance. This argues that Walker Ridge is not an easy place to conserve environmental resources in combination with its other uses. Several uses pose no substantial conflicts with conservation of environmental resources including recreational shooting, legal hunting, hiking, mountain biking, horseback riding, bird watching and nature study. (These uses, however, may not all be compatible with each other.) Uses that disturb vegetation and compact soil (e.g., ORV use) at a minimum require careful management to be compatible with Uses involving extensive clearing of vegetation and grading, and also disturbing vegetation and compacting soil (e.g., development of additional infrastructure and other facilities) probably can not be designed to be compatible with conservation of the environmental resources and values of Walker Ridge.

The sensitivity of Bear Valley's visual resources also should be taken into consideration in the management of Walker Ridge. Installation of larger structures that are visible from the floor of Bear Valley would impact its visual resources and its ability to continue to draw visitors to the region.

Other management issues include monitoring and controlling the spread of invasive, nonnative species, and fire management.

This nomination does not propose any specific management policies for Walker Ridge. However, it does argue that the criterion of "need for special management attention" is met. The conditions and trends of environmental resources and values with current and potential future uses require serious consideration; and many opportunities exist for improved conservation. Furthermore, it is worth noting that in the absence of ACEC status, the environmental resources and values of Walker Ridge have not been adequately considered in management plans and activities.

Many of the environmental features, human uses and management problems found at Walker Ridge also have been present at other BLM lands and played a key role in ACEC designation (e.g., in the Red Hills Management Area) or in requests for such designation (e.g., the Knoxville public lands). Walker Ridge actually has environmental resources of comparable or greater uniqueness and sensitivity than other nearby ACECs and RNAs and ACECs and RNAs with similar types of resources. (Examples of these ACECs and RNAs include the Northern California Chaparral RNA, and the Cedar Roughs and Cache Creek ACECs.) It also has comparable or greater environmental values than these existing ACECs and RNAs.

Conclusions

This nomination concludes that the Walker Ridge public lands, meet the criteria of relevance and importance of their environmental resources and values, and that there is a need for special management attention. These resources include a high diversity of plant species, serpentine-associated plant species, special-status plants, potentially undescribed plant taxa, unusual plant associations and

its ecosystem significance as the watershed of Bear Valley. The public lands along Walker Ridge also have significant educational, recreational and scenic values. These resources and values require special management attention, particularly as many current and potential future uses of these lands are not necessarily compatible with conservation of these resources and values. Thus, designation as an ACEC is merited.

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Survey Protocols Required for NEPA/ESA Compliance for BLM Special Status Plant Species

Policy

It is BLM policy to conduct inventories to determine the occurrence and status of all special status plant species on lands managed by BLM or affected by BLM actions. This includes pro-active inventories directed toward developing plans or determining the status of plant species, as well as inventories conducted to determine the impacts of BLM planned or authorized actions on any special status plants that might be within the area of a proposed project. Such inventories are to be conducted at the time of year when such plant species can be found and positively identified.

Definition and Purpose

Inventory is the periodic and systematic collection of data on the distribution, condition, trend, and utilization of special status plant species (BLM Manual 6600).

Inventories are conducted for many reasons; however, for the purpose of this document only one inventory "reason" is addressed:

> To ensure compliance with the National Environmental Policy Act and the Endangered Species Act by having sufficient information available to adequately assess the effects of proposed actions on special status plants. Assessments of the effects of these actions are documented in biological assessments (if the project involves Federally listed species and qualifies as a "major construction activity" as defined by the ESA).

Special status plants include plant taxa that are Federally listed as threatened and endangered, proposed for Federal listing, candidates for Federal listing, State listed as rare, threatened, or endangered, or BLM sensitive species. All plant species that are currently on List 1B of the California Native Plant Society's Inventory of Rare and Endangered Plants of California (http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi), are BLM sensitive species, along with others that have been designated by the California State Director. BLM is party to a Memorandum of Understanding with the California Department of Fish and Game to collect information for inclusion in the California Natural Diversity Data Base. Therefore, in addition to inventorying for plants formally recognized as special status species by BLM, contractors must also inventory for all plant, lichen, and fungi species recognized as "special" by the California Natural Diversity Data Base (http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/SPPlants.pdf). Although the following discussion uses the term "special status plants," it should be interpreted to mean all of the plant taxa discussed above.

The inventory requirements below apply to energy rights-of-way applications on Federal lands managed by the BLM in California and northwestern Nevada. Projects that include State or private lands or require State approval will likely also require conformance with the rare plant

survey guidelines of the California Department of Fish and Game (http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/guideplt.pdf).

Timing and Intensity of Inventory

Before conducting inventories, contractors for BLM or energy companies should research three valuable sources to see if BLM special status species are known from the project area: the California Natural Diversity Data Base (CNDDB), CALFLORA, and the Biogeographic Information & Observation System (BIOS). However, CNDDB and BIOS are positive occurrence databases only, the lack of data should not be used as verification that the species does not exist in a given location. Inventories must be timed so that contractors can both locate and positively identify target plant species in the field. Inventories must be scheduled so that they will detect all special status species present. A single inventory on a single date will seldom suffice. For example, when one special status plant species suspected to be in the inventory can only be found and identified in April and another species can only be located and identified in August, at least two inventories are necessary. The first inventory can facilitate the second and/or third inventory, however, if potential sites for the late-flowering species are flagged during the first inventory. If sufficient information is available on the habitat requirements of potentially occurring species (substrate, plant community, etc.), and the site in question is believed to be unsuitable for those species, a field visit should still be conducted to document and validate the assumptions for believing that the species to be absent. In advance of the project site inventory, contractors should visit known populations of the target species in similar habitat conditions to determine current-year growth conditions and phenology. If, based on these visits to known populations, it appears likely that the project site inventory will fail to detect occurrences because of drought conditions (as may be the case for annual plant species or geophytic plants), BLM may require contractors to perform additional inventories in the following year.

Field Survey - Methodology

Field surveys will be floristic in nature, i.e., the contractor identifies every plant taxon observed in the project area to the taxonomic level necessary to determine rarity and listing status. Surveys will be conducted so that they will ensure a high likelihood of locating all the plant taxa in the project area. Depending on the size of the project area and the heterogeneity of the habitats within the project area, surveys will involve one or a combination of the following survey methods.

Complete Survey

A complete survey is a 100 percent visual examination of the project area (Figure 1) using transects. The length of the transect and distance between transects might change as the topography changes throughout the project area. Transects should be spaced so that all of the area between transects is visible and so that the smallest rare plant expected to occur is visible. The surveyor (1) compiles a species list while traversing the project area and keeps track of the plant community or habitat type where each taxon occurs; (2) maps the locations of all rare taxa

encountered using a GPS unit, and (3) fills out a CNDDB Native Species Field Survey Form for each location of each rare taxon encountered.

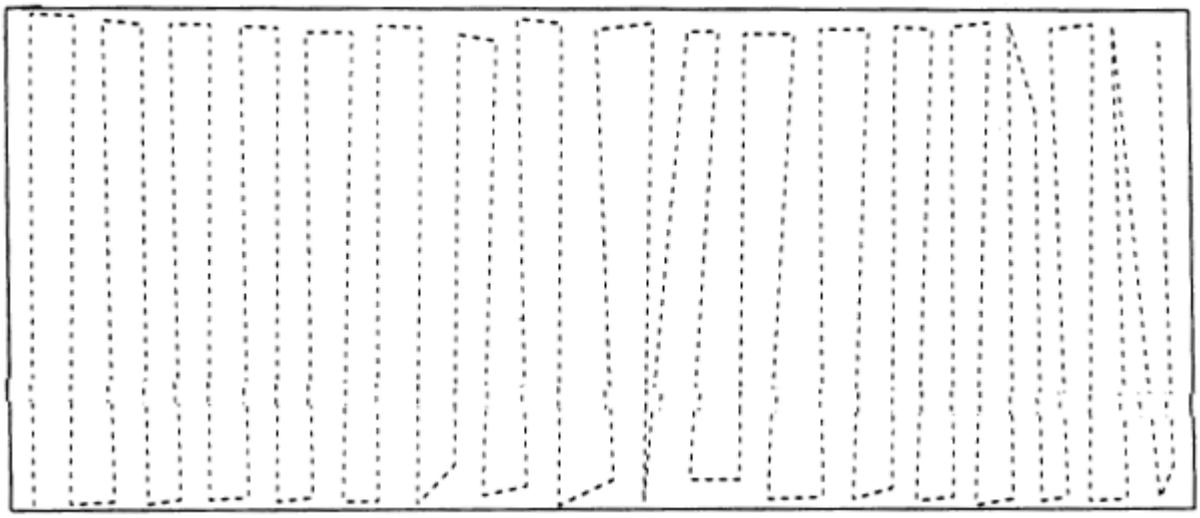

Figure 1. **Complete survey.**

Intuitive Controlled Survey

An intuitive controlled survey is a complete survey of habitats with the highest potential for supporting rare plant populations and a less intense survey of all other habitats present (Figure 2). This type of survey can only be accomplished by botanists familiar with the habitats of all the plant species that may reasonably be expected to occur in the project area. The botanist traverses through the project area enough to see a representative cross section of all the major plant habitats and topographic features. During the survey, the botanist compiles a species list of all plant taxa seen en route and keeps track of the plant community or habitat type where each taxon occurs. The surveyor maps the locations of all rare taxa encountered using a GPS unit and fills out a CNDDB Native Species Field Survey Form for each location of each rare taxon encountered. When the surveyor arrives at an area of "high potential" habitat, s/he surveys that area completely as described above and shown in Figure 1. High potential habitat areas include areas defined in a pre-field review of potential rare plants and habitat and other habitats where a rare species appears during the course of initial field work traversing the project area. Areas within the project area that are not the focus of a complete survey must be surveyed sufficiently so that is the botanist and BLM reasonably believe that few if any additional species would be added to the complete species list for the project area. The report must justify why the botanist did not consider these areas to have a high potential for supporting rare plant species and thus did not subject the area to a complete survey.

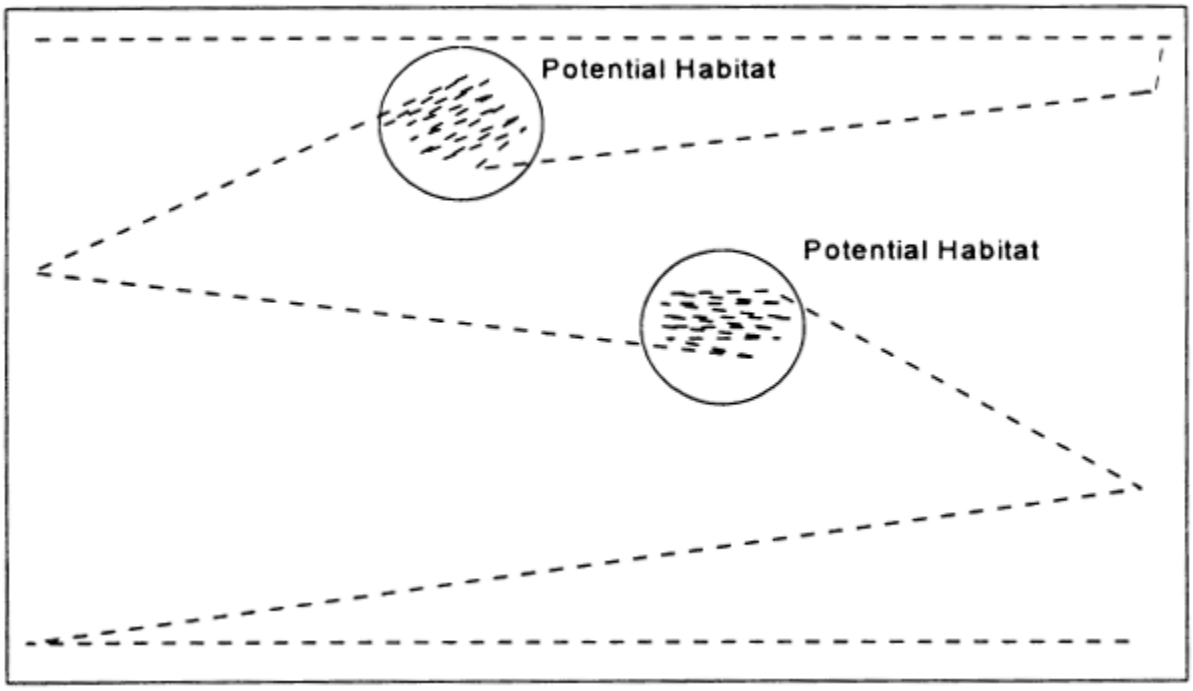

Figure 2. Intuitive Controlled Survey.

Documenting the Results of Inventory

The results of special status plant inventories should be well documented. This documentation must include as a minimum the completion and submission of Field Survey Forms and shapefiles/geodatabases of all special status plants found by BLM personnel or consultants. CNDDB defines occurrences as being separated from other plant locations by 0.25 mile. These forms are submitted to the BLM State Botanist and to the California Natural Diversity Data Base (CNDDB) at the following address:

CNDDB - Dept. of Fish and Game
1807 13th Street, Suite 202
Sacramento, CA 95811

Forms can be submitted electronically at: CNDDB@dfg.ca.gov
Copies of the Field Survey Form are available from the CNDDB at the same address. They will also provide photocopied parts of topo maps if needed.

If the inventory discovers any rare or unusual plant communities,[1] a Natural Community Field Survey Form must be completed for each such community and sent to the CNDDB at the address above.

[1] Rare or unusual plant communities includes those communities marked with asterisks in the most current list of California plant communities recognized by the California Natural Diversity Data Base, available at: http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/natcomlist.pdf, and Unusual Plant Assemblages as defined in

Most special status plant inventories of public lands conducted to assess the impacts of a project are performed by consultants hired by project proponents. These inventories must meet or exceed the intensity level required for the project by BLM. Personnel conducting the inventory must meet the qualifications outlined in this document. For BLM to adequately determine the quality of third party inventories, the following information must appear in a detailed report to BLM from the consultant or project proponent:

a. Project description, including a detailed map of the project location and study area.

b. A written description of the biological setting, including descriptions of the plant communities found in the project area and a vegetation map. Plant communities should be described and mapped to at least the alliance level using the vegetation classification system of the California Department of Fish and Game (CDFG). A list of the alliances currently recognized by CDFG can be found at: http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/NaturalCommunitiesList_Oct07.pdf. When the Manual of California Vegetation is published in 2009, the alliances recognized in that document should be used.

c. A detailed description of the inventory methodology, including techniques and intensity of the inventory and maps showing areas actually searched. This will also include areas searched but no special status plants found.

d. The results of the inventory.

e. The dates of the inventory.

f. An assessment of potential impacts and recommended mitigation measures to reduce impacts.

g. Recommended management actions to conserve any special status plants encountered should include both actions the BLM might take, as well as actions that might be taken by the FWS (listing or delisting of T/E plants, changes in candidate status, etc.).

h. A discussion of the significance of any special status plant occurrences found, with consideration for other nearby occurrences, and the distribution of the species as a whole.

i. Assessments of the health, population size, and protective status of any special status plants found.

j. A complete list of *all* plant species (not just special status species) identified within the project area, and a discussion of any range extensions discovered as a result of the inventory

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the California Desert Conservation Area Plan (http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/cdd/cdcaplan.Par.15259.File.dat/CA_Desert_.pdf) or shown on Map 6 of the California Desert Conservation Area Plan, as amended (copies on file at the BLM California State Office, the California Desert District, and each of the field offices in the California Desert District).

k. Copies of all Field Survey Forms, for all special status plant occurrences found, or Natural Community Field Survey Forms, for any unusual communities found.

l. The name(s) and qualifications of the persons conducting the inventory.

m. A list of references cited, persons contacted and herbaria visited.

n. Additional data needs.

o. Other information as appropriate such as vegetation maps and photographs (see below).

Voucher specimens of special status plants should be collected if necessary to conclusively document the occurrence of the species and if the collection will not adversely affect the health of the population at the site. Collection of Federally listed plants on Federal lands requires a permit from the FWS. If voucher specimens are collected, they should be deposited in major recognized herbaria for future reference, preferably The University of California, Berkeley (UC), The Jepson Herbarium (JEPS), The California Academy of Sciences (CAS), or Rancho Santa Ana Botanic Garden (RSA).

Photographs should be taken of the areas inventoried, of all special status plants found, and of the habitat associated with each special status plant occurrence.

Data Collection – Data Submission

Data should be collected using a Mapping Grade GPS Receiver with an accuracy of < 3 meters Horizontal Root Mean Squared (HRMS).

All positions should be logged according to the following specifications:

- Maximum PDOP of 6
- Minimum of 5 Satellites
- Minimum elevation mask of 15 degrees
- Datum: NAD83
- Coordinate System: UTM Zone 10 or Zone 11, depending on where in California or northwestern Nevada the data is collected.
- ESRI compliant formats (Geodatabase, Coverage or Shapefile)

Metadata must be included with the data. The following must be included in the metadata:

- Project Name
- Purpose – Summary of the intentions with which the data set was developed
- Abstract Information – Brief narrative summary of the data set
- Location – What area(s) does your data cover? ie., list statewide, regions, city, county?
- Developer – Who collected the data?

Data Dictionary – A data dictionary must be used for all projects. The dictionary should include the data that is requested on the CNDDB forms. This ensures that the botanist is collecting (electronically) the same data as is requested by DFG. This also ensures that all inventories are collecting the same level/standard of data.

GIS Support Data: BLM California State Office Downloadable Data Sources

Index Page with BLM Data Naming Rules
http://www.blm.gov/ca/pa/gis/Data_Page/Data%20Page.html

Geospatial Data Downloads
http://www.blm.gov/ca/gis/index.html

All data collected in and referenced to the public land survey are required to conform to this version of PLSS published on the California BLM data download page.

In addition to the local Field Office; a copy of the Data (DVD or CDROM) must be submitted directly to:

BLM California State Office
Geographic Services, W1939
Attention: Chief Mapping Sciences
2800 Cottage Way
Sacramento, CA 95825

GIS Questions: Please Call
(916) 978-4343

Qualifications of Personnel Conducting Inventories

All personnel conducting special status plant inventories must have the following:

- strong backgrounds in plant taxonomy and plant ecology
- strong background in field sampling design and methods
- knowledge of the floras of the inventory area including the special status plant species
- familiarity with natural communities of the area

These qualifications help ensure that all special status plants in the inventory area will be located, including taxa that BLM or project proponents did not predict at the start of the inventory. All survey efforts must be coordinated with the responsible BLM Field Office botanist or biologist

Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities

State of California
CALIFORNIA NATURAL RESOURCES AGENCY
Department of Fish and Game
November 24, 2009[1]

INTRODUCTION AND PURPOSE

The conservation of special status native plants and their habitats, as well as natural communities, is integral to maintaining biological diversity. The purpose of these protocols is to facilitate a consistent and systematic approach to the survey and assessment of special status native plants and natural communities so that reliable information is produced and the potential of locating a special status plant species or natural community is maximized. They may also help those who prepare and review environmental documents determine when a botanical survey is needed, how field surveys may be conducted, what information to include in a survey report, and what qualifications to consider for surveyors. The protocols may help avoid delays caused when inadequate biological information is provided during the environmental review process; assist lead, trustee and responsible reviewing agencies to make an informed decision regarding the direct, indirect, and cumulative effects of a proposed development, activity, or action on special status native plants and natural communities; meet California Environmental Quality Act (CEQA)[2] requirements for adequate disclosure of potential impacts; and conserve public trust resources.

DEPARTMENT OF FISH AND GAME TRUSTEE AND RESPONSIBLE AGENCY MISSION

The mission of the Department of Fish and Game (DFG) is to manage California's diverse wildlife and native plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public. DFG has jurisdiction over the conservation, protection, and management of wildlife, native plants, and habitat necessary to maintain biologically sustainable populations (Fish and Game Code §1802). DFG, as trustee agency under CEQA §15386, provides expertise in reviewing and commenting on environmental documents and makes protocols regarding potential negative impacts to those resources held in trust for the people of California.

Certain species are in danger of extinction because their habitats have been severely reduced in acreage, are threatened with destruction or adverse modification, or because of a combination of these and other factors. The California Endangered Species Act (CESA) provides additional protections for such species, including take prohibitions (Fish and Game Code §2050 *et seq.*). As a responsible agency, DFG has the authority to issue permits for the take of species listed under CESA if the take is incidental to an otherwise lawful activity; DFG has determined that the impacts of the take have been minimized and fully mitigated; and, the take would not jeopardize the continued existence of the species (Fish and Game Code §2081). Surveys are one of the preliminary steps to detect a listed or special status plant species or natural community that may be impacted significantly by a project.

DEFINITIONS

Botanical surveys provide information used to determine the potential environmental effects of proposed projects on all special status plants and natural communities as required by law (i.e., CEQA, CESA, and Federal Endangered Species Act (ESA)). Some key terms in this document appear in **bold font** for assistance in use of the document.

For the purposes of this document, **special status plants** include all plant species that meet one or more of the following criteria[3]:

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1 This document replaces the DFG document entitled "Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened and Endangered Plants and Natural Communities."

2 http://ceres.ca.gov/ceqa/

3 Adapted from the East Alameda County Conservation Strategy available at http://www.fws.gov/sacramento/EACCS/Documents/080228_Species_Evaluation_EACCS.pdf

- Listed or proposed for listing as threatened or endangered under ESA or candidates for possible future listing as threatened or endangered under the ESA (50 CFR §17.12).

- Listed[4] or candidates for listing by the State of California as threatened or endangered under CESA (Fish and Game Code §2050 *et seq.*). A species, subspecies, or variety of plant is **endangered** when the prospects of its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, disease, or other factors (Fish and Game Code §2062). A plant is **threatened** when it is likely to become endangered in the foreseeable future in the absence of special protection and management measures (Fish and Game Code §2067).

- Listed as rare under the California Native Plant Protection Act (Fish and Game Code §1900 *et seq.*). A plant is **rare** when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens (Fish and Game Code §1901).

- Meet the definition of rare or endangered under CEQA §15380(b) and (d). Species that may meet the definition of rare or endangered include the following:

  - Species considered by the California Native Plant Society (CNPS) to be "rare, threatened or endangered in California" (Lists 1A, 1B and 2);

  - Species that may warrant consideration on the basis of local significance or recent biological information[5];

  - Some species included on the California Natural Diversity Database's (CNDDB) *Special Plants, Bryophytes, and Lichens List* (California Department of Fish and Game 2008)[6].

- Considered a **locally significant species,** that is, a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA §15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G). Examples include a species at the outer limits of its known range or a species occurring on an uncommon soil type.

Special status natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special status species or their habitat. The most current version of the Department's *List of California Terrestrial Natural Communities*[7] indicates which natural communities are of special status given the current state of the California classification.

Most types of wetlands and riparian communities are considered special status natural communities due to their limited distribution in California. These natural communities often contain special status plants such as those described above. These protocols may be used in conjunction with protocols formulated by other agencies, for example, those developed by the U.S. Army Corps of Engineers to delineate jurisdictional wetlands[8] or by the U.S. Fish and Wildlife Service to survey for the presence of special status plants[9].

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4 Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata.

5 In general, CNPS List 3 plants (plants about which more information is needed) and List 4 plants (plants of limited distribution) may not warrant consideration under CEQA §15380. These plants may be included on special status plant lists such as those developed by counties where they would be addressed under CEQA §15380. List 3 plants may be analyzed under CEQA §15380 if sufficient information is available to assess potential impacts to such plants. Factors such as regional rarity vs. statewide rarity should be considered in determining whether cumulative impacts to a List 4 plant are significant even if individual project impacts are not. List 3 and 4 plants are also included in the California Natural Diversity Database's (CNDDB) *Special Plants, Bryophytes, and Lichens List.* [Refer to the current online published list available at: http://www.dfg.ca.gov/biogeodata.] Data on Lists 3 and 4 plants should be submitted to CNDDB. Such data aids in determining or revising priority ranking.

6 Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata.

7 http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/natcomlist.pdf. The rare natural communities are asterisked on this list.

8 http://www.wetlands.com/regs/tlpge02e.htm

9 U.S. Fish and Wildlife Service Survey Guidelines available at http://www.fws.gov/sacramento/es/protocol.htm

BOTANICAL SURVEYS

Conduct botanical surveys prior to the commencement of any activities that may modify vegetation, such as clearing, mowing, or ground-breaking activities. It is appropriate to conduct a botanical field survey when:

- Natural (or naturalized) vegetation occurs on the site, and it is unknown if special status plant species or natural communities occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
- Special status plants or natural communities have historically been identified on the project site; or
- Special status plants or natural communities occur on sites with similar physical and biological properties as the project site.

SURVEY OBJECTIVES

Conduct field surveys in a manner which maximizes the likelihood of locating special status plant species or special status natural communities that may be present. Surveys should be **floristic in nature**, meaning that every plant taxon that occurs on site is identified to the taxonomic level necessary to determine rarity and listing status. "Focused surveys" that are limited to habitats known to support special status species or are restricted to lists of likely potential species are not considered floristic in nature and are not adequate to identify all plant taxa on site to the level necessary to determine rarity and listing status. Include a list of plants and natural communities detected on the site for each botanical survey conducted. More than one field visit may be necessary to adequately capture the floristic diversity of a site. An indication of the prevalence (estimated total numbers, percent cover, density, etc.) of the species and communities on the site is also useful to assess the significance of a particular population.

SURVEY PREPARATION

Before field surveys are conducted, compile relevant botanical information in the general project area to provide a regional context for the investigators. Consult the CNDDB[10] and BIOS[11] for known occurrences of special status plants and natural communities in the project area prior to field surveys. Generally, identify vegetation and habitat types potentially occurring in the project area based on biological and physical properties of the site and surrounding ecoregion[12], unless a larger assessment area is appropriate. Then, develop a list of special status plants with the potential to occur within these vegetation types. This list can serve as a tool for the investigators and facilitate the use of reference sites; however, special status plants on site might not be limited to those on the list. Field surveys and subsequent reporting should be comprehensive and floristic in nature and not restricted to or focused only on this list. Include in the survey report the list of potential special status species and natural communities, and the list of references used to compile the background botanical information for the site.

SURVEY EXTENT

Surveys should be comprehensive over the entire site, including areas that will be directly or indirectly impacted by the project. Adjoining properties should also be surveyed where direct or indirect project effects, such as those from fuel modification or herbicide application, could potentially extend offsite. Pre-project surveys restricted to known CNDDB rare plant locations may not identify all special status plants and communities present and do not provide a sufficient level of information to determine potential impacts.

FIELD SURVEY METHOD

Conduct surveys using **systematic field techniques** in all habitats of the site to ensure thorough coverage of potential impact areas. The level of effort required per given area and habitat is dependent upon the vegetation and its overall diversity and structural complexity, which determines the distance at which plants can be identified. Conduct surveys by walking over the entire site to ensure thorough coverage, noting all plant taxa

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[10] Available at http://www.dfg.ca.gov/biogeodata/cnddb

[11] http://www.bios.dfg.ca.gov/

[12] Ecological Subregions of California, available at http://www.fs.fed.us/r5/projects/ecoregions/toc.htm

observed. The level of effort should be sufficient to provide comprehensive reporting. For example, one person-hour per eight acres per survey date is needed for a comprehensive field survey in grassland with medium diversity and moderate terrain[13], with additional time allocated for species identification.

TIMING AND NUMBER OF VISITS

Conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting. Space visits throughout the growing season to accurately determine what plants exist on site. Many times this may involve multiple visits to the same site (e.g. in early, mid, and late-season for flowering plants) to capture the floristic diversity at a level necessary to determine if special status plants are present[14]. The timing and number of visits are determined by geographic location, the natural communities present, and the weather patterns of the year(s) in which the surveys are conducted.

REFERENCE SITES

When special status plants are known to occur in the type(s) of habitat present in the project area, observe reference sites (nearby accessible occurrences of the plants) to determine whether those species are identifiable at the time of the survey and to obtain a visual image of the target species, associated habitat, and associated natural community.

USE OF EXISTING SURVEYS

For some sites, floristic inventories or special status plant surveys may already exist. Additional surveys may be necessary for the following reasons:

- Surveys are not current[15]; or
- Surveys were conducted in natural systems that commonly experience year to year fluctuations such as periods of drought or flooding (e.g. vernal pool habitats or riverine systems); or
- Surveys are not comprehensive in nature; or fire history, land use, physical conditions of the site, or climatic conditions have changed since the last survey was conducted[16]; or
- Surveys were conducted in natural systems where special status plants may not be observed if an annual above ground phase is not visible (e.g. flowers from a bulb); or
- Changes in vegetation or species distribution may have occurred since the last survey was conducted, due to habitat alteration, fluctuations in species abundance and/or seed bank dynamics.

NEGATIVE SURVEYS

Adverse conditions may prevent investigators from determining the presence of, or accurately identifying, some species in potential habitat of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any given year. Discuss such conditions in the report.

The failure to locate a known special status plant occurrence during one field season does not constitute evidence that this plant occurrence no longer exists at this location, particularly if adverse conditions are present. For example, surveys over a number of years may be necessary if the species is an annual plant having a persistent, long-lived seed bank and is known not to germinate every year. Visits to the site in more

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[13] Adapted from U.S. Fish and Wildlife Service kit fox survey guidelines available at www.fws.gov/sacramento/es/documents/kitfox_no_protocol.pdf

[14] U.S. Fish and Wildlife Service Survey Guidelines available at http://www.fws.gov/sacramento/es/protocol.htm

[15] Habitats, such as grasslands or desert plant communities that have annual and short-lived perennial plants as major floristic components may require yearly surveys to accurately document baseline conditions for purposes of impact assessment. In forested areas, however, surveys at intervals of five years may adequately represent current conditions. For forested areas, refer to "Guidelines for Conservation of Sensitive Plant Resources Within the Timber Harvest Review Process and During Timber Harvesting Operations", available at https://r1.dfg.ca.gov/portal/Portals/12/THPBotanicalGuidelinesJuly2005.pdf

[16] U.S. Fish and Wildlife Service Survey Guidelines available at http://www.fws.gov/ventura/speciesinfo/protocols_guidelines/docs/botanicalinventories.pdf

than one year increase the likelihood of detection of a special status plant especially if conditions change. To further substantiate negative findings for a known occurrence, a visit to a nearby reference site may ensure that the timing of the survey was appropriate.

REPORTING AND DATA COLLECTION

Adequate information about special status plants and natural communities present in a project area will enable reviewing agencies and the public to effectively assess potential impacts to special status plants or natural communities[17] and will guide the development of minimization and mitigation measures. The next section describes necessary information to assess impacts. For comprehensive, systematic surveys where no special status species or natural communities were found, reporting and data collection responsibilities for investigators remain as described below, excluding specific occurrence information.

SPECIAL STATUS PLANT OR NATURAL COMMUNITY OBSERVATIONS

Record the following information for locations of each special status plant or natural community detected during a field survey of a project site.

- A detailed map (1:24,000 or larger) showing locations and boundaries of each special status species occurrence or natural community found as related to the proposed project. Mark occurrences and boundaries as accurately as possible. Locations documented by use of global positioning system (GPS) coordinates must include the datum[18] in which they were collected;
- The site-specific characteristics of occurrences, such as associated species, habitat and microhabitat, structure of vegetation, topographic features, soil type, texture, and soil parent material. If the species is associated with a wetland, provide a description of the direction of flow and integrity of surface or subsurface hydrology and adjacent off-site hydrological influences as appropriate;
- The number of individuals in each special status plant population as counted (if population is small) or estimated (if population is large);
- If applicable, information about the percentage of individuals in each life stage such as seedlings vs. reproductive individuals;
- The number of individuals of the species per unit area, identifying areas of relatively high, medium and low density of the species over the project site; and
- Digital images of the target species and representative habitats to support information and descriptions.

FIELD SURVEY FORMS

When a special status plant or natural community is located, complete and submit to the CNDDB a California Native Species (or Community) Field Survey Form[19] or equivalent written report, accompanied by a copy of the relevant portion of a 7.5 minute topographic map with the occurrence mapped. Present locations documented by use of GPS coordinates in map and digital form. Data submitted in digital form must include the datum[20] in which it was collected. If a potentially undescribed special status natural community is found on the site, document it with a Rapid Assessment or Relevé form[21] and submit it with the CNDDB form.

VOUCHER COLLECTION

Voucher specimens provide verifiable documentation of species presence and identification as well as a public record of conditions. This information is vital to all conservation efforts. Collection of voucher specimens should

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17 Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata. For Timber Harvest Plans (THPs) please refer to the "Guidelines for Conservation of Sensitive Plant Resources Within the Timber Harvest Review Process and During Timber Harvesting Operations", available at https://r1.dfg.ca.gov/portal/Portals/12/THPBotanicalGuidelinesJuly2005.pdf

18 NAD83, NAD27 or WGS84

19 http://www.dfg.ca.gov/biogeodata

20 NAD83, NAD27 or WGS84

21 http://www.dfg.ca.gov/biogeodata/vegcamp/veg_publications_protocols.asp

be conducted in a manner that is consistent with conservation ethics, and is in accordance with applicable state and federal permit requirements (e.g. incidental take permit, scientific collection permit). Voucher collections of special status species (or suspected special status species) should be made only when such actions would not jeopardize the continued existence of the population or species.

Deposit voucher specimens with an indexed regional herbarium[22] no later than 60 days after the collections have been made. Digital imagery can be used to supplement plant identification and document habitat. Record all relevant permittee names and permit numbers on specimen labels. A collecting permit is required prior to the collection of State-listed plant species[23].

BOTANICAL SURVEY REPORTS

Include reports of botanical field surveys containing the following information with project environmental documents:

- **Project and site description**
  - A description of the proposed project;
  - A detailed map of the project location and study area that identifies topographic and landscape features and includes a north arrow and bar scale; and,
  - A written description of the biological setting, including vegetation[24] and structure of the vegetation; geological and hydrological characteristics; and land use or management history.
- **Detailed description of survey methodology and results**
  - Dates of field surveys (indicating which areas were surveyed on which dates), name of field investigator(s), and total person-hours spent on field surveys;
  - A discussion of how the timing of the surveys affects the comprehensiveness of the survey;
  - A list of potential special status species or natural communities;
  - A description of the area surveyed relative to the project area;
  - References cited, persons contacted, and herbaria visited;
  - Description of reference site(s), if visited, and phenological development of special status plant(s);
  - A list of all taxa occurring on the project site. Identify plants to the taxonomic level necessary to determine whether or not they are a special status species;
  - Any use of existing surveys and a discussion of applicability to this project;
  - A discussion of the potential for a false negative survey;
  - Provide detailed data and maps for all special plants detected. Information specified above under the headings “Special Status Plant or Natural Community Observations,” and “Field Survey Forms,” should be provided for locations of each special status plant detected;
  - Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms should be sent to the CNDDB and included in the environmental document as an Appendix. It is not necessary to submit entire environmental documents to the CNDDB; and,
  - The location of voucher specimens, if collected.

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22 For a complete list of indexed herbaria, see: Holmgren, P., N. Holmgren and L. Barnett. 1990. Index Herbariorum, Part 1: Herbaria of the World. New York Botanic Garden, Bronx, New York. 693 pp. Or: http://www.nybg.org/bsci/ih/ih.html

23 Refer to current online published lists available at: http://www.dfg.ca.gov/biogeodata.

24 A vegetation map that uses the National Vegetation Classification System (http://biology.usgs.gov/npsveg/nvcs.html), for example *A Manual of California Vegetation*, and highlights any special status natural communities. If another vegetation classification system is used, the report should reference the system, provide the reason for its use, and provide a crosswalk to the National Vegetation Classification System.

- **Assessment of potential impacts**
  - A discussion of the significance of special status plant populations in the project area considering nearby populations and total species distribution;
  - A discussion of the significance of special status natural communities in the project area considering nearby occurrences and natural community distribution;
  - A discussion of direct, indirect, and cumulative impacts to the plants and natural communities;
  - A discussion of threats, including those from invasive species, to the plants and natural communities;
  - A discussion of the degree of impact, if any, of the proposed project on unoccupied, potential habitat of the species;
  - A discussion of the immediacy of potential impacts; and,
  - Recommended measures to avoid, minimize, or mitigate impacts.

QUALIFICATIONS

Botanical consultants should possess the following qualifications:

- Knowledge of plant taxonomy and natural community ecology;
- Familiarity with the plants of the area, including special status species;
- Familiarity with natural communities of the area, including special status natural communities;
- Experience conducting floristic field surveys or experience with floristic surveys conducted under the direction of an experienced surveyor;
- Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
- Experience with analyzing impacts of development on native plant species and natural communities.

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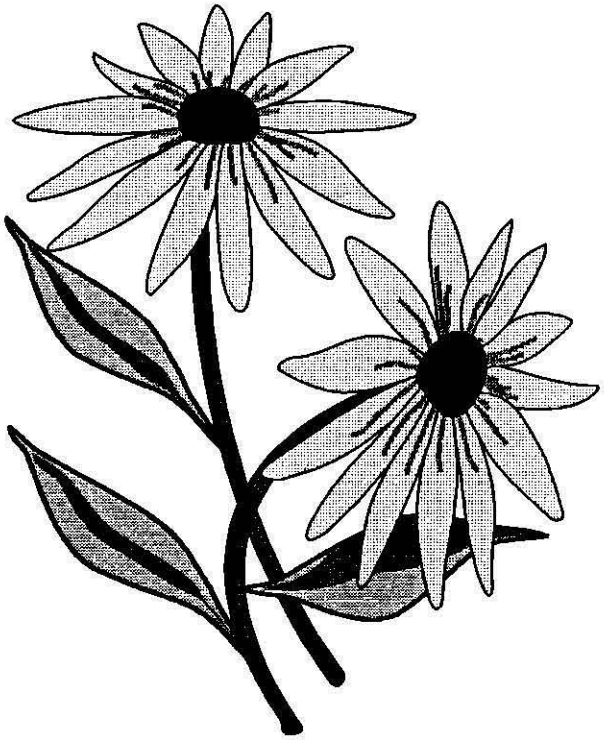
Special Status Plant Management



BLM Manual Handbook 6840-1

H-6840-1 - SPECIAL STATUS PLANT MANAGEMENT

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CHAPTER I

I. INTRODUCTION

This handbook provides direction on the management of special status plants. Special status plants are those plant species that are Federally listed as endangered or threatened, officially proposed for Federal listing as endangered or threatened, candidates for Federal listing as endangered or threatened, State listed as endangered, threatened, or rare, or listed as sensitive by the California State Director. The handbook expands on the policy elaborated in BLM Manual 6840 and California BLM Manual Supplement 6840.06 and establishes the procedures to be used in complying with that policy.

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CHAPTER II

II. PROCESS FOR DESIGNATING SENSITIVE PLANT SPECIES OR RECOMMENDING CHANGES IN STATUS

A. Designating Plant Species as Sensitive.

Pursuant to BLM Manual 6840 and California Manual Supplement 6840.06, the California State Director may designate plant species that do not fall into any of the other categories of special status species as sensitive species. Sensitive species are to be given the same level of protection as Federal candidate species. By policy (BLM Manual Supplement 6840.06) all plant species on List 1B (Plants Rare, Threatened, or Endangered in California and Elsewhere) of the most recent edition of the California Native Plant Society's *Inventory of Rare and Endangered Plants of California* that are on BLM lands or affected by BLM actions and that do not fall into one of the other categories of this section are designated as sensitive species in California. Exceptions are any such List 1B species that the State Director has specifically removed from the sensitive species list (see II.B. below). Other plant species may be designated as sensitive in accordance with the following procedure.

1. Requests to add plant species to the sensitive species list must be submitted in writing to the State Director. The requests must demonstrate clearly that designation of the species as sensitive is warranted. The request must be based on biological information for the species and its habitat and should detail threats or potential threats to the species and its habitat. The request must also detail how the special management afforded by designation will help the species.

2. Following review by the State Director the species is either designated as sensitive through Instruction Memorandum or California Manual Handbook Supplement or the request for designation is denied, in which case the State Director documents the reasons for denial in a memorandum to the District or Area Manager who initiated the request.

B. Removing Plant Species from the Sensitive Species List.

1. District and Area Managers may request that a plant species be removed from the sensitive species list. Such requests must be accompanied by evidence that demonstrates the species clearly does not merit sensitive species status. Requests must be based on biological information on the species and its habitat.

2. Following review by the State Director the species is either removed from the sensitive species list through Instruction Memorandum or California Manual Handbook Supplement or the request for removal is denied, in which case the State Director documents the reasons for denial in a memorandum to the District Manager or Area Manager who initiated the request.

C. Recommending Other Changes in Status.

1. Petitions to the Fish and Wildlife Service (FWS) to list or delist plant species.

a. Guidelines for petitioning the FWS to list or delist species are found in BLM Manual 6840.22B.

b. Only the State Director may submit petitions to FWS. District and Area Managers may request the State Director to submit a petition to list or delist a species. This request must be based solely on biological information on the species and its habitat and must address the five factors for listing included in section 4 of the Endangered Species Act (ESA). These factors are:

1). The present or threatened destruction, modification, or curtailment of its habitat or range.

2). Overutilization for commercial, recreational, scientific, or educational purposes.

3). Disease or predation.

4). The inadequacy of existing regulatory mechanisms.

5). Other natural or manmade factors affecting its continued existence.

c. Following review by the State Director the petition is either submitted to the FWS, with a copy of the transmittal memorandum forwarded to the District or Area Manager who submitted the request, or the request for petition is denied, in which case the State Director documents the reasons for denial in a memorandum to the District or Area Manager who initiated the request.

2. Requests to FWS to add or remove species from the list of candidate species.

a. The FWS periodically publishes in the *Federal Register* lists of species that are candidates for listing as threatened or endangered. This list changes depending on new information received by the FWS. The BLM may submit information on the status of candidate species and request that species be added to or removed from the candidate list as appropriate.

b. Only the State Director may submit requests to the FWS to add or remove species from the list of candidate species. District and Area Managers may request the State Director to submit a memorandum to the FWS to add or remove a species from the candidate species list. This request must be based solely on biological information on the species and its habitat and must address the five factors for listing included in section 4 of the Endangered Species Act and listed under II.C.1.b., above.

c. Following review by the State Director the request is either submitted to the FWS, with a copy of the transmittal memorandum forwarded to the District or Area Manager who submitted the request, or the request for change in candidate status is denied, in which case the State Director documents the reasons for denial in a memorandum to the District or Area Manager who initiated the request. The procedure for revising critical habitat designation is similar to the procedure for listing or delisting species.

3. Petitions to the State of California, Fish and Game Commission, to list or delist species.

a. Pursuant to the California Endangered Species Act, the BLM may submit petitions to the State of California, Fish and Game Commission, to list or delist a species.

b. Only the State Director may submit petitions to the Fish and Game Commission. District and Area Managers may request the State Director to submit a petition to list or delist a species. This request must include information regarding the population trend, range, distribution, abundance, and life history of a species, the factors affecting the ability of the population to survive and reproduce, the degree and immediacy of the threat, the impact of existing management efforts, suggestions for future management, and the availability and sources of information. The petition shall also include information regarding the kind of habitat necessary for species survival, a detailed distribution map, and any other factors deemed relevant.

c. Following review by the State Director the petition is either submitted to the Fish and Game Commission, with a copy of the transmittal memorandum forwarded to the District or Area Manager who submitted the request, or the request for petition is denied, in which case the State Director documents the reasons for denial in a memorandum to the District or Area Manager who initiated the request.

CHAPTER III

III. INVENTORY

A. Policy.

It is BLM policy to conduct inventories to determine the occurrence and status of all special status plant species on lands managed by BLM or affected by BLM actions. This includes pro-active inventories directed toward developing plans or determining the status of plant species, as well as inventories conducted to determine the impacts of BLM planned or authorized actions on any special status plants that might be within the area of a proposed project. Such inventories are to be conducted at the time of year when such plant species can be found and positively identified.

B. Definition and Purpose.

1. Inventory is the periodic and systematic collection of data on the distribution, condition, trend, and utilization of special status plant species (BLM Manual 6600).

2. Inventories are conducted for many reasons, including:

a. To determine the conservation status of a plant species.

b. To develop plans, including resource management plans, recovery plans, species management guides, habitat management plans, coordinated resource management plans, and others.

c. To ensure compliance with the National Environmental Policy Act and the Endangered Species Act by having sufficient information available to adequately assess the effects of proposed actions on special status plants. Assessments of the effects of these actions are documented in biological assessments (if the project involves Federally listed species and qualifies as a "major construction activity" as defined by the ESA) or biological evaluations (for projects involving other special status species and/or not qualifying as a major construction activity). See Section V. (Biological Assessments and Biological Evaluations).

d. To serve as a baseline for monitoring.

3. The specific objectives of an inventory can vary depending on the purpose for the inventory. For example, an inventory may seek to:

a. Locate all populations of a single rare plant species. This would be a logical objective if the purpose of the inventory is to determine the conservation status of a plant species or to develop a species management guide or habitat management plan.

b. Locate all populations of all special status plant species in one location. This would be the objective if the purpose of the inventory is to prepare a biological assessment or biological evaluation on the effects of a proposed action on all of the special status species in the project area.

c. Provide some measure of the viability of each population of a special status plant, either throughout the species' range or in a smaller area such as a proposed project area. For example, the inventory may seek to determine:

1). Numbers of genets or ramets of the special status plant within each population.

2). Numbers of plants by age or reproductive class (vegetative, flowering, fruiting).

3). Associated species.

4). Associated habitat features.

5). Visual disturbances/Current and potential threats.

C. Timing and Intensity of Inventory.

1. Prior to conducting inventories, two valuable sources (RareFind and the California Native Plant Society Electronic Inventory) should be researched to see if special status species are already known from the area. Inventories must be timed so that target plant species can both be located in the field and positively identified. Inventories conducted to determine the conservation status of individual species or to develop activity plans for individual species can easily be scheduled in advance. Inventories to determine the occurrence of *all* special status plant species in a given area (e.g., project area, planning area) are more problematic. Ideally the inventory can be scheduled in such a way that it will detect all such species present. There may be situations, however, when a single inventory at one point in time will not suffice (for example, when one special status plant species suspected of occurring in the area to be inventoried can only be found and identified in April, and another can only be located and identified in August). In these cases a second inventory effort must be scheduled. The second inventory, however, may be facilitated by the first, if potential sites for the late-flowering species are flagged during the

first inventory. If sufficient information is available on the habitat requirements of potentially occurring species (substrate, plant community, etc.), and the site in question is believed to be unsuitable for those species, a field visit should still be conducted to verify and document the reasons for believing the species to be absent. Ideally, prior to inventory known populations of the target species that occur in similar habitat conditions should be visited to determine growth conditions and phenology. The absence of certain species in the pre-survey may indicate that those species would not be apparent in the project area survey.

2. Intensity of inventory should be tied to the objectives of the inventory. If the objectives are to determine the conservation status of a single species, the inventory would likely focus on finding as many occurrences of the species as possible. Inventory efforts could be focused in only those areas and those habitats with the highest probability of finding the target species. If many occurrences are found through such an inventory effort, searching less likely habitat would be unnecessary. If, however, few occurrences are located, the decision might be made to expand the inventory to areas considered less likely to harbor the species. Intensity of inventories conducted to assess the impacts of BLM initiated or authorized actions must be based on both the probability of a special status plant occurring within the project area and the degree of habitat disturbance expected to result from the action. This is covered under III.E., below.

D. Qualifications of Personnel Conducting Inventories.

1. Ideally, all personnel conducting inventories for special status plants should have strong backgrounds in plant taxonomy, plant ecology, field sampling design and methods, and knowledge of the floras of the area to be inventoried. Such qualifications help to ensure that all special status plants occurring in the area to be inventoried will be located, including those that were not predicted to occur at the start of the inventory.

2. Focused inventories for one or a few species may be conducted by personnel not possessing all of the qualifications discussed above, as long as these personnel are adequately trained in the identification of the target species.

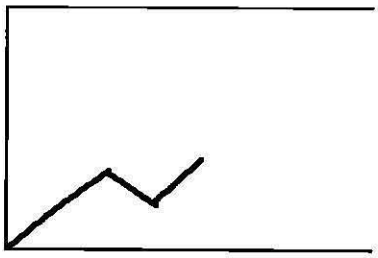
3. Non-BLM personnel conducting inventories on the public lands must meet the qualifications outlined in III.D.1., above. This is particularly important for inventories conducted to evaluate the impacts of projects on special status plants (see III.E., below).

E. Inventories to Ensure Compliance with the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), and BLM Policy.

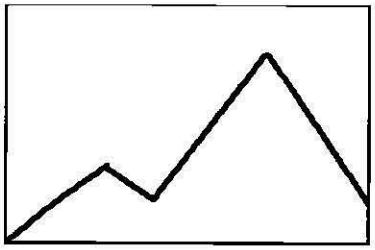
1. Five intensity levels of inventory are recognized for the purpose of complying with NEPA, the ESA, and BLM policy. These are described and illustrated in Figure III-1.

Figure III-1. Plant Inventory Intensity Levels

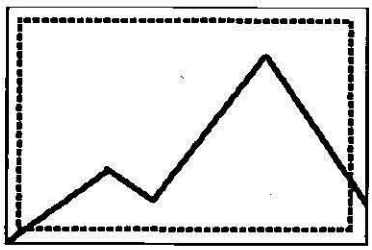
1. Field Check. The surveyor gives the area a quick "once-over" but does not walk completely through the project area. The entire project area has not been examined.



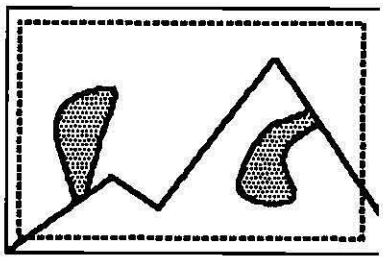
2. Cursory. The surveyor gives the area a quick "once-over" by walking through the project area. The entire project area has not been examined.



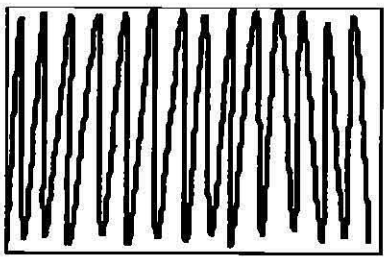
3. General. The surveyor gives the area a closer look by walking through the project area and perimeter or by walking more than once through the area. Most of the project area is examined.



4. Intuitive Controlled. The surveyor has given the area a closer look by conducting a complete inventory of a specific area after walking through the project area and perimeter or by walking more than once through the area. Most of the project area is examined.



5. Complete. The surveyor has walked throughout the project area until all of the area has been examined.



2. The minimum level of inventory required is a function of two factors: 1) the probability of occurrence of special status plants in the project area and 2) the level of habitat disturbance associated with the proposed action. Both of these factors are ranked as "Low," "Medium," or "High," based on the criteria given in Figure III-2. and Table III-1. The minimum level of inventory required is then determined by Table III-2.

Note that these are *minimum* levels of inventory. A more intensive inventory may be performed. If special status plant species are located during the inventory, a complete inventory must be conducted of the plant location(s) and potential habitat areas.

Also note that for Federally listed plant species, the minimum levels of inventory given above may not be adequate to make a "no effect" determination. Only if the BLM has determined that there is no probability of a listed plant occurring within the project area or has performed either a complete or intuitive controlled inventory with negative results can a "no effect" determination be made. A finding of "no probability" can be based on the project area's lying outside the known range of a listed plant species or on the fact that there is absolutely no suitable habitat for the species in the project area. Otherwise, the BLM must obtain the concurrence of the FWS that the minimum inventory level for a listed plant is adequate for a specific project.

Figure III-2. Probability of occurrence of special status plant species.

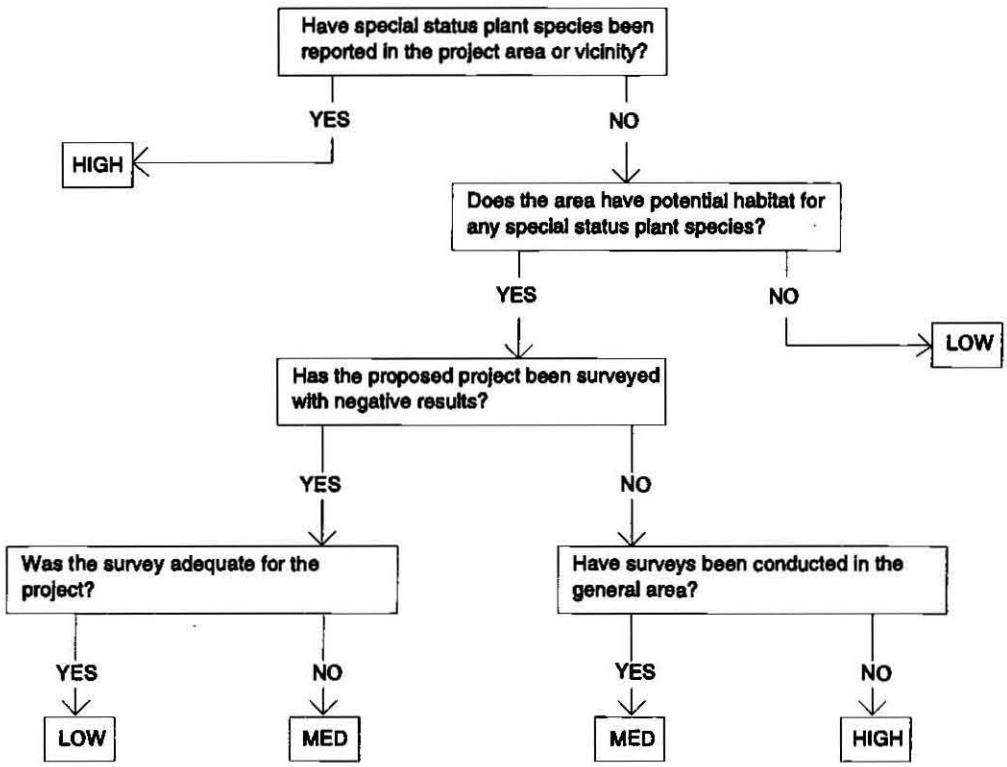


Table III-1. Potential for site disturbance from various actions.

Type of Project	Habitat Disturbance Level
Forest Management	
Large green sales (>500 mbf)	High
Small green sales (<500 mbf)	Medium to High
Salvage sales	Low to High depending on intensity
Commercial thinning sales	Medium to High
Rotary axe cutting (low ground pressure)	Low to Medium
Chainsaw cutting site prep & release	Low
Tractor piling	High
Chemical site prep & release (spot spray)	Low
Vegetation treatment (brush spraying, burn, etc.)	Medium to High
Ripping site prep	High
Cutting and grubbing release (normally 24" spot around tree)	Low
Planting	Low
Hand Piling	Low
Pile burning	Low
Broadcast or underburning	Low to Medium
Firewood cutting/green	Low to Medium
Firewood cutting/dead	Low to Medium
Road Construction and Maintenance	
Road construction	High

Type of Project	Habitat Disturbance Level
Road maintenance	Low
Grazing Management	
Grazing permits/leases	Low to High depending on vulnerability of particular plant species
Fences	Low
Cattleguards	Low
Seedings	High
Vegetation treatments	Medium to High
Windmills	Low (for project construction; concentrated grazing that may result in vicinity of troughs Medium to High)
Water pipelines	Low to Medium (for project construction; concentrated grazing that may result in vicinity of troughs Medium to High)
Spring developments	Low to High
Reservoirs	High
Recreation Management	
OHVs - play use	Medium to High
OHVs - ancillary use	Low
Facility construction	High
Back country use (hiking, mountain biking, horseback riding, hunting, river running, etc.)	Low
Facility maintenance	Low
Toilet or minor facility placement	Low

Type of Project	Habitat Disturbance Level
Cultural Resource Management	
Subsurface data recovery - sampling	Low (coring) to Medium (trenching)
Subsurface data recovery - 100 percent	High
Public Land Disposals	High
Rights-of-Way Permits	
Gas/Oil pipelines	Medium to High
Buried cables	Medium to High
Transmission lines	Medium to High
Wind energy development	High
Hydro development	Medium to High
Communication sites	High
Access/with road construction	High
Access/existing road	Low
Desert land entries	High
Fire Management	
Fire breaks - Tractor	High
Fuel breaks - Shaded (cut & burn)	Low to Medium
Prescribed burning	Low to High
Fire rehabilitation	Low to High
Retardent drops	Low to Medium

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Type of Project	Habitat Disturbance Level
Mineral Resource Management	
Fluids (Oil and Gas and Geothermal)	
Surface use plans for applications for permits to drill (APDs)	High
Surface use plan amendment	High
Sundry notices	Low to High
Geophysical exploration	Low to High
Pipelines	Low to High
Transmission lines	Medium to High
Power plant site	High
Solids	
Mining notices (43 CFR 3809)	Medium to High
Mining plans of operation (includes all forms of hardrock exploration and development)	Medium to High
Exploration plan for mineral material (43 CFR 3600)	Low to Medium
Exploration plan for hardrock leasing	Medium to High
Exploration plan for acquired lands (43 CFR 3500)	Medium to High
Soil Sampling	Low (coring) to High (trenching)

Type of Project	Habitat Disturbance Level
Wildlife Management	
Guzzlers	Low
Wildlife reintroductions	Low
Chaining	Low to High
Stream restoration	Low to High
Wetland restoration	Low to High

Table III-2. Determining minimum intensity of inventory based on habitat disturbance level and probability of occurrence of special status plants.

Habitat Disturbance Level	Probability of Occurrence	Minimum Intensity of Inventory
High	High	Complete or Intuitive Controlled
Medium	High	Complete or Intuitive Controlled
High	Medium	General
Low	High	General
High	Low	Field Check
Medium	Medium	Cursory
Low	Medium	Cursory
Medium	Low	None
Low	Low	None

3. Many special status plant inventories of public lands conducted to assess the impacts of a project are performed by consultants hired by project proponents. These inventories must meet or exceed the intensity level demanded by the project (III.E.2., above). Personnel conducting the inventory must meet the qualifications outlined in III.D.1., above. In order for the BLM to adequately determine the quality of such third party inventories the following information is required from the consultant or project proponent (these are adapted from the recommendations of the California Native Plant Society [CNPS] and the California Department of Fish and Game as given in CNPS's *Inventory of Rare and Endangered Vascular Plants of California*, Fourth Edition, February, 1994):

a. Project description, including a detailed map of the project location and study area.

b. A written description of the biological setting, referencing the plant community nomenclature used and a vegetation map.

c. A detailed description of the inventory methodology, including maps showing areas actually searched.

d. The dates of field visits.

e. The results of the inventory, including detailed maps.

f. An assessment of potential impacts.

g. A discussion of the importance of any special status plant occurrences found, with consideration for other nearby occurrences, and the distribution of the species as a whole.

h. Recommended mitigation measures to reduce impacts.

i. A complete list of *all* plant species (not just special status species) identified within the project area.

j. Copies of all Field Survey Forms, for all special status plant occurrences found, or Natural Community Field Survey Forms, for any unusual communities found (these forms are discussed in detail under III.F., below).

k. The name(s) and qualifications of the persons conducting the inventory.

l. A list of references cited, persons contacted, and herbaria visited.

m. Note whether voucher specimens (where their collection will not adversely impact special status plants) of special status species were deposited in a major herbarium.

F. Documenting the Results of Inventory.

1. The results of special status plant inventories should be well documented. This documentation must include, as a minimum, the completion and submission of Field Survey Forms and mapped occurrences on xeroxed 7.5' topos for all special status plants found by BLM personnel or consultants. Occurrences are defined by CNDDB as being separated from other plant locations by 1/4 mile. These forms are submitted to the California Natural Diversity Data Base (CNDDB) at the following address:

California Department of Fish and Game
Natural Heritage Division
Natural Diversity Data Base
1416 9th Street
Sacramento, CA 95814

Copies of the Field Survey Form are available from the CNDDB at the same address. They will also provide xeroxed parts of topo maps if needed. An example of the form is given as Illustration 1.

2. If the inventory discovers any unusual plant communities, a Natural Community Field Survey Form must be completed for each such community and sent to the CNDDB at the above address. Illustration 2. is an example of this form.

3. A written report documenting results should be prepared for most inventories. Such a report should include the following:

a. Detailed maps of the areas inventoried and the special status plants and unusual plant communities found. Base maps used should be 7½ minute USGS quadrangles. Such information should be entered into a geographical information system (GIS) at the earliest opportunity. Global positioning systems, if available, can be used to accurately determine locations of occurrences and to record these for input into GIS.

b. Written descriptions of the areas inventoried, including the plant communities present.

H-6840-1 - SPECIAL STATUS PLANT MANAGEMENT

California Native Species Field Survey Form

ILLUSTRATION 1

Mail to:
Natural Diversity Data Base
California Department of Fish and Game
1416 Ninth Street, 12th Floor
Sacramento, California 95814

For office use only

Source Code _____ Quad Code _____

Elm Code _____ Occ # _____

Copy to _____ Map Index # _____

Date of field work ____ . ____ . ____
mo day yr

Scientific Name:

Common Name:

Species Found? ☐ ☐ _____
yes no *If not, why?*

Total # Individuals _____ Subsequent visit? ☐ yes ☐ no

Is this an existing NDDB occurrence? _____ ☐ no ☐ unk.
Yes, Occ. #

Collection? If yes: _____ _____
number Museum/Herbarium

Reporter: _____

Address: _____

_____

Phone: ( ) _____

Plant Information

Phenology: _____ _____ _____
% vegetative % flowering % fruiting

Animal Information

Age Structure: _____ _____ _____
adults # juveniles # unknown

☐ ☐ ☐ ☐ ☐ ☐ ☐
nesting breeding foraging wintering roosting burrow site other

Location (Please also attach or draw map on back.)

County: _____ Landowner/Mgr: _____

Quad Name: _____ Elevation: _____ UTM: _____

T R ¼ of ¼ Sec T R ¼ of ¼ Sec

Habitat Description (Plant communities, dominants, associates, substrate/soils, aspects/slope)

Other rare spp.?

Site Information Overall site quality: ☐ Excellent ☐ Good ☐ Fair ☐ Poor

Current/surrounding land use:

Visible disturbances, possible threats:

Comments:

Determination: (Check one or more, fill in the blanks)

___ Keyed in a site reference: _____

___ Compared with specimen housed at: _____

___ Compared with photo/drawing in: _____

___ By another person (name): _____

___ Other: _____

Photographs: (Check one or more)

	Slide	Print
Plant/animal	___	___
Habitat	___	___
Diagnostic Feature	___	___

May we obtain duplicates at our expense? ☐ Yes ☐ No

California Natural Community Field Survey Form

ILLUSTRATION 2

Mail to:
Natural Diversity Data Base
California Dept. of Fish and Game
1416 Ninth Street
Sacramento, CA 95814
(916) 324-6857

For office use only
Source Code_____ Quad Code_____
Community Code _____ Occ #_____
Map Index #_____ Update Y _____ N _____

Please provide as much of the following information as you can. Please attach a map (if possible, based on the USGS 7.5 minute series) showing the site's location and boundaries. Use the back if needed.

Community name:_____

Reporter:_____ Phone _____
Affiliation and Address_____
Date of field work:_____ County:_____
Location:_____

Quad name: _____T____R ____ ____ ¼ of___ ¼ sec____ Meridian_____
UTM Zone __ __ Northing _ _ _ _ _ _ _ _ Easting _ _ _ _ _ _ _
Landowner/Manager: _____ Photographs: Slide ☐ Print ☐
Elevation: _____Aspect: _____ Slope (indicate % or °)_____ Drainage:_____
Site acreage: _____ Evidence of disturbance/threats: _____

Current land use: _____
Substrate/Soils: _____

General description of community: _____

Any Special Plants or Animals present: _____

Successional status/Evidence of regeneration of dominant taxa:_____

Overall site quality: Excellent___ Good ___Fair ___Poor ___Comments: _____

Basis for report: Remote image ___Binocular/Telescopic survey _____
Windshield survey ___ Brief walk-thru ___ Detailed survey ___ Other _____
Relevé: In the space below, indicate each species cover % within the following growth form categories:

Trees	Shrubs	Herbs/Graminoids

Continue on back if needed. Thank you for your contribution.

CHAPTER IV

IV. MONITORING.

A. Monitoring Priority

1. Although all species should be monitored at some level, some species require more intensive monitoring than others. Decisions on prioritizing sensitive species for monitoring should be based upon degrees of rarity, existing threats, and potential conflict. Existing threats include management actions, declining or widely fluctuating populations, and poor or changing habitat. Potential conflict should take into account future management actions and Bureau/public interest.

2. The following rating system is for determining monitoring priority for listed and proposed plant species. If a species is included in an existing activity plan that calls for a certain level of monitoring, then its rank should be increased as needed. Note that these are minimum monitoring standards. More intensive and/or more frequent monitoring may be required for particular plant species and situations.

Level of existing threats on BLM land

2 pts	high
1 pt	medium
0 pts	low

Number of known occurrences on BLM land

2 pts	< 5 occurrences
1 pt	6-20 occurrences
0 pts	> 20 occurrences

Degree of potential conflict

2 pts	high
1 pt	medium
0 pts	low or absent

RATING	MINIMUM MONITORING LEVEL
5 or 6 points	Annual quantitative monitoring*
3 or 4 points	Quantitative monitoring every three years*
1 or 2 points	Fill out Field Survey Form every five years

* Quantitative monitoring is more time-consuming and expensive than qualitative monitoring, but is usually appropriate for high priority listed and proposed plant species. In some cases, however, qualitative monitoring may not be appropriate even for these high priority species. There may be situations, for example, where the physical act of quantitative monitoring may have unacceptable adverse effects on a population. Decisions not to conduct quantitative monitoring on these high priority plant species should be documented in writing and approved by the State Director.

Demographic monitoring is the most intense level of monitoring because it involves marking and tracking the fate of individuals through time. For those high priority plant species that are amenable to demographic monitoring (these are typically perennial plants without long-lived seedbanks), the use of demographic techniques should be strongly considered because they allow for more powerful evaluations of the effects of management decisions on the viability of these plants.

B. Quantitative Monitoring Studies

1. Quantitative monitoring studies require that some attribute of the target plant species be *measured*. Often this means that the number of individuals is counted (either in total or by size class), but it can also mean that the size (height, cover, or both) of individual plants is measured or that the number of flowers and or seeds is counted.

2. It is possible to take *all* of the possible measurements at a given site (for example, the observer is interested in determining the change over time in the number of plants at a site and *all* of the plants at the site are counted each time the site is monitored). In this case no statistical analysis is required and any change observed is real (assuming no measurement errors occur).

3. Often it is not feasible or efficient to take all of the possible measurements and *sampling* is required. When this is the case, some form of *random* sampling must be used and

the data subjected to statistical analysis.

4. It is vital that a monitoring study plan be developed for each plant species monitored. The study plan, at a minimum, needs to include the following components:

a. Species and sites to be monitored

b. Management objectives

c. Monitoring objectives

d. Actions to be taken if management objectives are not met.

e. Study design

f. Method of analysis

5. The study plan should be circulated for review among co-workers, managers, other botanists, and other interested parties prior to conducting the monitoring.

6. The results of each monitoring study should be documented in periodic (ideally annual) reports. A non-technical summary report should be prepared for managers and the public. A technical report should be prepared and circulated to botanists and other interested specialists.

7. Refer to the BLM Technical Reference on Monitoring Special Status Plants for critical information on designing effective monitoring studies.

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CHAPTER V

V. BIOLOGICAL ASSESSMENTS AND BIOLOGICAL EVALUATIONS.

A. Biological Assessments.

A Biological Assessment is required for "a construction project (or other undertaking having similar physical impacts) which is a major Federal action significantly affecting the quality of the human environment as referred to in the National Environmental Policy Act." (50 CFR 402.02). A Biological Assessment is a document that evaluates the potential effects of the action on listed and proposed species and designated or proposed critical habitat. The primary purpose of the Biological Assessment is to determine whether any listed species or designated critical habitats are likely to be adversely affected by the action and whether formal Section 7 consultation or conference is necessary. If only proposed species or proposed critical habitat occur in the project area then formal consultation is not required, although conference may be required. Guidance concerning the subjects to be addressed in the Biological Assessment is provided in 50 CFR 402.12(f). A species list is required for all Biological Assessments. The species list for the project area can be obtained from the Service, or a list of species may be provided to the Service for written concurrence. The Assessment must identify and evaluate effects on all listed and proposed species that may occur in the project area. The Biological Assessment should be initiated within 90 days after receipt of the species list, and completed within 180 days after receipt. If this timeframe is exceeded, an updated species list should be requested or submitted.

B. Biological Evaluations

Biological Evaluations are similar to Biological Assessments, however there is no 180 day timeframe and the Evaluation can be in the form of a report or other document. Biological Evaluations are prepared for any actions that are not major construction activities but are within the range of listed or proposed species or designated critical habitats. They are also prepared to evaluate the effects of actions on other special status plant species. The only difference between these two types of Biological Evaluation is that Biological Evaluations concluding that an action may affect a listed or proposed species (or critical habitat) are forwarded to the FWS as part of a Section 7 consultation or conference, whereas Biological Evaluations concluding that an action may affect other special status plants are not part of a formal consultation or conference with the FWS. Biological Evaluations that conclude that an action is likely to adversely affect a candidate plant species must be sent to the FWS as part of a request for technical assistance (see BLM Manual 6840.06C3) in order to receive FWS concurrence that the action will not contribute to the need to list. For actions affecting Federally listed or proposed species, Biological Evaluations should contain the same level of

detail as Biological Assessments. For other special status plants Biological Evaluations may not require the same level of detail depending on the nature of the action, but the information described below should be used as a guide.

C. General

The documentation of project effects on special status plant species that is normally provided in a separate and distinct document (Biological Assessment or Biological Evaluation) may be consolidated into a NEPA document, provided that (for listed or proposed plants or critical habitat) all of the substantive and information requirements of Section 7 of the ESA are met. See 50 CFR 402.06 for details concerning how the consultation, conference, and biological assessment procedures may be coordinated with other environmental reviews. While there are no strict requirements for Biological Assessments and Evaluations, the following information should be included. For more guidance concerning the contents of Biological Assessments, refer to 50 CFR 402.12(f). See Figure V-3. for information on the steps required for Biological Assessments/Evaluations.

1. Description of Proposed Action

This should include the project location, a map of project area, and a description of the project and when it will occur.

2. Prefield Review

This section should include a list of all potential special status plant species in the project area and their potential habitat areas, the identification and description of any occupied habitats or potential habitats that are unoccupied, and a discussion of any past reports or surveys of the project area.

3. Field Reconnaissance

Describe the survey methods and results.

4. Analysis and Recommendations

Give an analysis of the effects of the action (or of each project alternative) that would directly, indirectly, or cumulatively affect the species, plus an analysis of the effects of interdependent actions (e.g. construction of a road and maintenance of the road) on listed species and critical habitat.

Findings of "no effect" do not require written concurrence from FWS, but a copy of the Biological Assessment or Biological Evaluation should still be provided.

Findings of "beneficial effect" must have written concurrence from FWS and possible formal consultation.

Findings of "not likely to adversely affect" require the written concurrence of FWS and usually an informal consultation.

Findings of "may adversely affect" require formal section 7 consultation with FWS unless the proposed action can be modified before consultation is initiated.

For proposed species or critical habitat, findings of "may adversely affect" require a "conference" with FWS.

5. Recommendations

Specific recommendations for eliminating or compensating for any adverse effects (for each project alternative) should be included, such as timing or access restrictions. These recommendations may be developed with the help of FWS in an informal consultation.

6. References

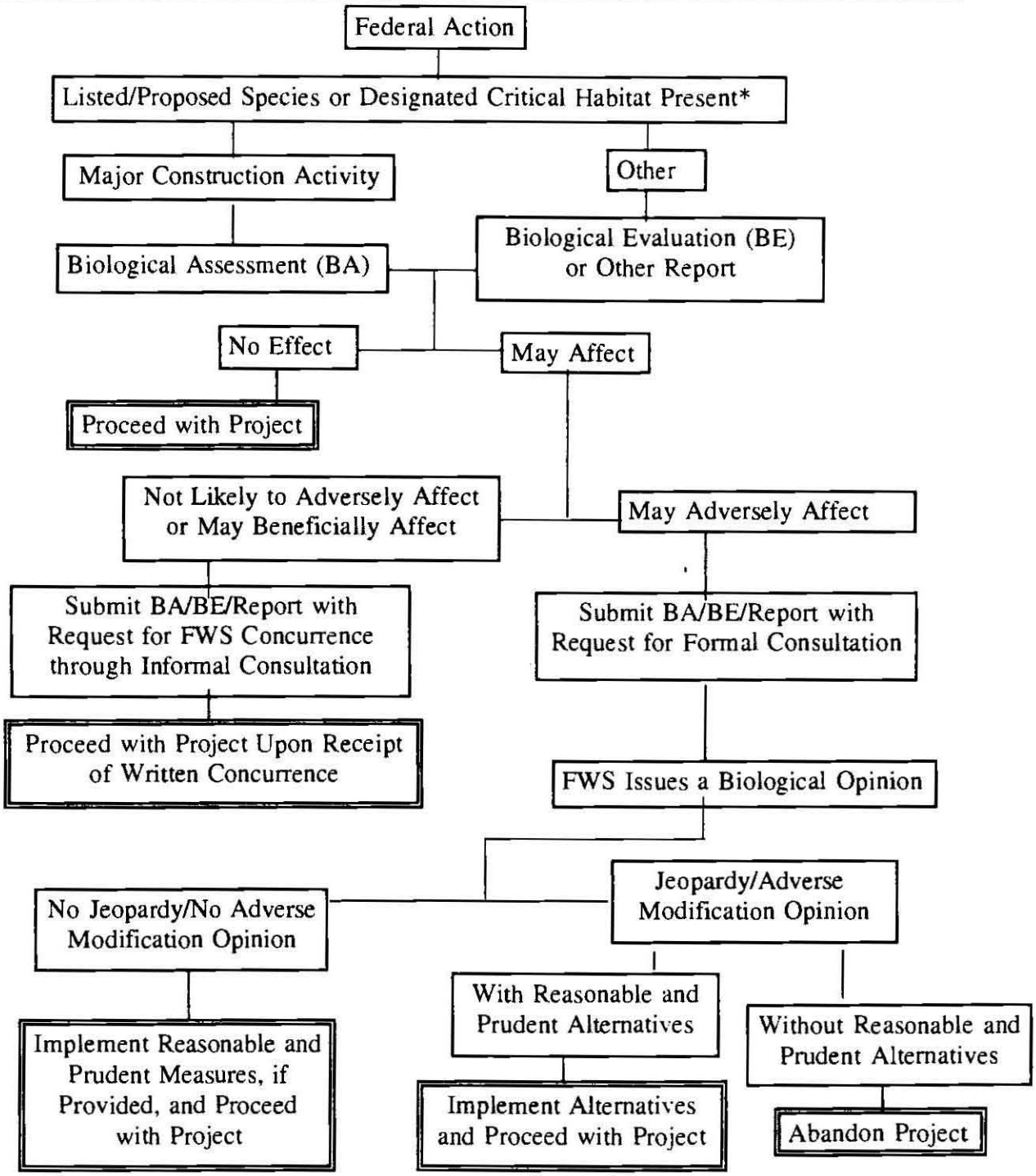
Include all contacts, contributors, literature, etc.

D. Biological Opinions

After receiving and analyzing the Biological Assessment or Biological Evaluation FWS will issue a Biological Opinion as to whether there will be "jeopardy" to the species or "adverse modification" to critical habitat. Most findings of "jeopardy" are accompanied by reasonable and prudent alternatives that would allow the project to proceed. If no reasonable and prudent alternatives can be agreed upon, the proposed project must be abandoned. While Federal agencies, the Governor, or a permit or license applicant may apply for an exemption for an agency action, this has rarely been done in the past.

FWS often includes Conservation Recommendations with a Biological Opinion that concludes there will be no jeopardy to the species. Although these are not binding, it is BLM policy to implement all of these recommendations unless there are compelling reasons not to do so. These reasons should be committed to writing and a copy forwarded to the State Director. Unlike animals, there are no incidental take provisions for plants under the ESA.

Figure V-3. Flow chart for Biological Assessments/Evaluations



*Assume the species is present if its habitat is present. Remember that for many plant species, especially annuals, surveys can only prove presence - not absence. Always consider potential impacts to a species if its habitat is present.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

California State Office

Release 6-25

Date 4/15/96

Subject H-6840-1 - Special Status Plant Management

1. Explanation of Material Transmitted: The material contained in this Handbook complements Manual 6840 and gives guidance for the management of Special Status Plants in California.

2. Reports Required: None.

3. Material Superseded: None.

4. Filing Instructions: File as directed below.

REMOVE:	INSERT:
None	H-6840-1

(Total: 18 sheets, double-sided)

ASSOCIATE STATE DIRECTOR

October 23, 2010

Via email and U.S. Mail

Rich Burns, Ukiah Field Office Manager
Ukiah Field Office, 2550 North State Street
Ukiah, California 95482
ukiahwindeis@ca.blm.gov

Re: Scoping Comments, Draft Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA (CACA-49639)

"It is a large industrial project"
Peter Eaton, AltaGas

Dear Mr. Burns,

Thank you for the opportunity to comment on the scope of environmental concerns to be addressed in the Bureau of Land Management's (BLM) Environmental Impact Statement (EIS) for the proposed AltaGas Renewable Energy Pacific, Inc.'s (AltaGas) proposed Walker Ridge Wind Project (CACA-49639). These comments are submitted by Tuleyome. Please also include our letters to Rich Burns (December 22, 2009), Rich Burns (January 2, 2010) and Kathy Hardy (February 18, 2010) as part of the official Scoping Comment record.

In addition, we are including a powerpoint presentation for the record. It was our intention to present this presentation at the October 8, 2010, scoping meeting but we were not permitted to do so.

Tuleyome also endorses and incorporates by reference the scoping comments submitted by The Wilderness Society and the California Native Plant Society.

Tuleyome is a regional not-for-profit conservation organization working to protect our wild and agricultural heritage in the Northern Inner Coast Range and Western Sacramento Valley for existing and future generations. Our office is in Woodland, CA.

Tuleyome has a history of working constructively with the BLM on behalf of the lands and resources administered by the Ukiah Office. In particular, we have worked with the BLM to eradicate Arundo and tamarisk on the Cache Creek Wilderness reach and on oversight of the use of grazing as a tool for invasive species management on the Bear Creek Unit. We have worked on trail construction to provide the public access to the previously landlocked Berryessa Peak Unit public lands and we are engaged on other issues.

Tuleyome is a proponent of the proposed Berryessa Snow Mountain National Conservation Area and we continue to develop strong grassroots support. While Tuleyome's efforts are directed

607 North Street Woodland, Ca 95695 | phone: (530) 350-2599 | fax: (530) 350 2729 | www.Tuleyome.org

toward a congressionally designated NCA, it is a strong validation of the ecological value of this special place that is has been discussed within the Administration as a potential National Monument.

Significant new information has become available over the last 5 years about the Walker Ridge region regarding several environmentally significant concerns, including geologic, biologic, mercury, wetlands, and other perspectives. All of these concerns are indicative of the remarkable nature of this special place.

Tuleyome supports the development of alternative energy sources as an essential part of our nation's energy supply, but the Walker Ridge area contains outstanding biological, ecological, geological, scenic, and wilderness qualities. From the information that has already been gathered regarding the environmental resources that could be significantly and adversely affected, it is clear that this area is inappropriate for wind development.

Activity Plan for Area of Critical Environmental Concern:
The BLM has failed to complete an Activity Plan for the three existing Areas of Critical Environmental Concern on Walker Ridge designated under the Ukiah Office Resource Management Plan. Tuleyome and the public can not adequately evaluate the environmental impacts on the existing ACEC's until those plans are completed. They must be completed with appropriate public process prior to initiation of the Project EIS.

Proposed Project Description:
The proposed project description as presented in the Plan of Development for the Walker Ridge Wind Generation Facility (June 24, 2010) is inadequate to assess the environmental impacts of the proposed projects:

- **The project area must include the entire 14,000 acres of the Walker Ridge Unit.** The California Native Plant Society has proposed that the entire Unit be designated as an Area of Critical Environmental Concern. While this designation will not in and of itself necessarily stop wind development, it emphasizes the overall ecological importance of the region. Ecological studies must examine the entire region, addressing plant communities, species of concern, and the ecological and conservation interrelationships within the entire region. As shown by recent fires, some plant communities may burn, but the species and ecological communities are protected within other locales that have not burned. This relationship is particularly important in sensitive ecological areas such as those found on serpentinite soils. It is important for BLM's planning purposes and Tuleyome's environmental concerns that the EIS assess the proposed project's impacts on these interrelationships throughout the entire Walker Ridge Unit.
- **Multi-year floristic and wildlife surveys are necessary to adequately study and assess the ecology of the region.** Recent fires have shown the importance of multi-year studies as plant successions have occurred on lands burned by the Walker Ridge fire.
- **Alternative project locations:** The proponent states that the "use of private land for this project was dismissed" but all locations and alternatives must be fully examined. Attempts to narrow alternative analysis merely to meet a federal government interest for development on public lands are unacceptable to Tuleyome and other organizations concerned with regional conservation issues. Please make sure that the EIS identifies the impacts that can be avoided by siting the proposed project on the private lands that were not considered by the applicant.
- **Road and Excavation Analysis:** The project involves massive earth excavation and disturbance, on serpentine rock and soils, which potentially contain mercury, certainly

contain chromium, and may contain asbestos. The project addressed in the EIS must have full engineering drawings *and 3-D modeling* for the public to adequately understand and consider the significant impacts of this project. In addition, the project description must indicate how the soils will be characterized and how they will be capped and sealed, or removed for proper disposal, so as to avoid any sediment transport that may mobilize and exacerbate mercury contamination or methylation in the region. It is in Tuleyome's view inappropriate that these soils and rock be used for roads where they may erode or release mercury through percolation.

- **Fire breaks and management concerns:** High-intensity fires occur in chaparral habitats, including those found on Walker Ridge. These fires can impact the project infrastructure; this risk must be addressed fully in the EIS, including the applicant's response to damage from such fires. In addition, wind turbines can start fires, and this risk must be addressed in the EIS, including BLM's management to prevent such fires. The project description alludes to fire breaks, which themselves result in significant ecological and environmental perturbations, and the EIS must fully describe BLM's fire management program as it is implemented with respect to this project, including identifying what permanent disturbances will occur and how BLM will mitigate those disturbances.
- **Wind resource data:** On several occasions, Mr. Peter Eaton has stated that the wind resource data is proprietary and that the public cannot see it. The data must be made available to evaluate the project particularly as it relates to other alternative locations. If it is not available from AltaGas the BLM must engage an independent third party contractor to provide verifiable data.
- **Bonding:** The project description needs to discuss in much more detail bonding for full decommissioning.

Geology, Including Mercury Contamination and Risk Assessment:
Walker Ridge is largely composed of serpentine rock (serpentinite) and soils related to the Coast Range Ophiolite as well as various rock types of the Franciscan Complex. These rocks are generally unstable and can result in large earth movements. In addition, these formations (particularly those related to the Coast Range Ophiolite) contain mercury, chromium and asbestos. Sulphur Creek and Bear Creek have had TMDLs adopted for mercury impairment (see below) and Indian Valley Reservoir has been recently listed under CWA Section 303(d) as an impaired water body for mercury. In addition, known hot springs at the north and south portions of the ridge show very high mercury levels. One half of all the mercury that flows to the Sacramento River system comes from the Cache Creek drainage and most of that comes off Walker Ridge. To avoid exacerbating mercury and other water quality and health concerns, all soils and rock in the path of development must be thoroughly characterized, and the EIS must address how the affected materials will be immobilized and capped or removed for proper disposal. All active and potential landslides on Walker Ridge must be mapped and assessed for stability as relates to the project.

Walker Ridge is a hot spot for mercury contamination. While much of the pollution is within the Sulpher Creek Mining District, the entire Ridge undoubtedly contains additional mercury sources. While primarily located along fault zones, hot springs at the north and south ends of the ridge have high mercury levels indicative of the overall extant of contamination.

The presence of mercury (and chromium) in serpentine rocks and soils (USGS reports) on Walker Ridge and elsewhere in the area constitute a potential public health hazard, should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development, road grading and digging for guy line supports could mobilize mercury-laden soils,

as well as increase sedimentation—the primary route of mercury discharges—into nearby water bodies. For example, Sulphur Creek, which drains a portion of Walker Ridge on the east side and flows through the Sulphur Creek Mining District, has a Total Maximum Daily Load (TMDL) for mercury. Sulphur Creek is a major tributary of Bear Creek which has a TMDL for methylmercury. These two drainages are part of the Upper Cache (Bear Creek) watershed. Cache Creek is the largest contributor of mercury contamination for the Bay Delta ecosystem, providing an estimated 50% of the total mercury load. Also noteworthy (albeit removed from the immediate proposed project area) is the Rathburn-Petry mine that occurs on Walker Ridge just above Bear Valley, now undergoing major cleanup operations for mercury remediation.

Indian Valley Reservoir, located directly downslope from the proposed development site was listed in 2009 under Clean Water Act Section 303(d) for mercury impairment. A TMDL plan must be prepared for the Reservoir. The sources of mercury contamination leading to the Indian Valley Reservoir listing are unknown at this time but may come from the west side of Walker Ridge. These potential sources must be identified and discussed fully in the EIS to ensure that no additional mobilization will occur as a result of the project.

The potential for increased sedimentation and mercury discharges represents a significant environmental risk that must be properly studied and characterized by a trusted independent entity such as the USGS prior to any authorization of actions that will mobilize sediments. Certification is required from the Central Valley Regional Water Board that additional activities on Walker Ridge can be conducted in ways consistent with California water quality laws, and with the Regional Board's TMDLs, prior to the BLM's authorization of actions that will exacerbate potential mercury releases prior to any significant soil disturbance activities that may result in further impairment.

The BLM has undertaken significant work at great public expense to reclaim abandoned mine sites on public lands and we must take every step and be very conservative to ensure that additional contamination does not occur. Any and all soils disturbance has the potential to contribute to this huge pollution problem.

Wetlands, Springs and Seeps:
All wetlands, seeps and springs on Walker Ridge must be identified and assessed for potential impact from the wind development. Significant changes in water hydrology may occur that must not harm these critical habitat areas.

Birds and Bats:
Golden Eagles, Bald Eagles, Red-tailed and Coopers Hawks and Prairie Falcons are reported to occur in the Walker Ridge area. All of these raptor species are protected under the federal Migratory Bird Treaty Act, and the U.S. Fish and Wildlife Service (USFWS) has also developed regulations to implement the Bald and Golden Eagle Protection Act. These species are also State species of special concern, and the both the Bald Eagle and the Golden Eagle are "fully protected" species under state law, California Fish & Game Code §§ 3511), and thus may not be taken or possessed. Bald Eagles remain an "Endangered" species pursuant to the California Endangered Species Act.

Preliminary estimates by Shawn Smallwood, PhD, indicate that the mean radius for locating killed birds from large wind turbines is 100 to 120 meters (pers. comm.). Birds, particularly Golden and Bald Eagles, Prairie Falcons, and red-tailed hawks are often moving fast with the wind; and, the large turbine blades with large mass have a big throw capacity.

The impact of construction and operation of the proposed project on these and other bird species must be fully addressed for all phases of the project. Raptor impacts associated with each alternative to the proposed project must be analyzed. BLM should identify its management policy for these species and determine whether or not the impacts associated with the proposed project are contrary to established policy. *They must also ensure, consistent with existing law that no take of Golden Eagles will occur due to the project.*

It is our understanding that there are large bat communities and many species of bats in and around Walker Ridge. The EIS is required to address the occurrence of all bat species that may be affected, as well as the project's impacts on them and any mitigation measures that can be implemented to reduce those impacts.

The following questions must be fully addressed in the EIS:

Birds:

- How will bird kills be located and counted particularly in chaparral habitat?
- What is the vegetation clear radius necessary for accurate counts?
- How often will counts be made to ensure accuracy and overcome the predatory bias?
- How will third party independent surveys be guaranteed to ensure accuracy and data integrity?

Bats:

- What are the communities of bats located in and around Walker Ridge?
- What are their current population numbers?
- What are estimated kill numbers?
- What are necessary bat population numbers to ensure survival into the future
- How will kills be counted and what third party independent surveys be guaranteed to ensure accuracy and data integrity?

Lighting:
Federal requirements will necessitate lighting on the 428 foot tall wind turbines. The EIS must fully and specifically study and analyze the affect of these lights on wildlife, birds and bats in this relatively undisturbed habitat which is an important south-north migratory corridor.

Noise:
The proposed project description discounts the impacts of noise as similar to that of the background wind. However, recent information indicates that humans living near wind turbines are disturbed by the noise of wind turbines. The EIS must fully and specifically study and analyze the affect of wind turbine noise on wildlife, birds and bats in this relatively undisturbed habitat which is an important south-north migratory corridor.

Project Alternatives:
The EIS must ensure a comprehensive analysis of all alternatives pursuant to NEPA. In addition, the No Action or ACEC alternative should be studied as the preferred alternative for Walker Ridge;

- No Action: Given the ecologically sensitive nature of Walker Ridge and the existence of significant public health concerns, the No Action alternative should be identified as the preferred alternative.
- Adoption of Area of Critical Environmental Concern: This action recognizes the ecological significance of the region. Additional information since the original CNPS

petition was developed and submitted to BLM confirms the appropriateness of this designation.

- Other locations: This should include in-depth analysis of the Geysers region plus all potential private land options in the region. Comparison to known wind development such as in Solano County at Rio Vista should be made in order to assess the efficacy of this proposal in meeting energy needs, particularly as it relates to the destruction of other significant public resources and uses on Walker Ridge.
- Management of the Citizen's Wilderness Inventory for its wilderness characteristics
- An assessment of all other potential wind energy development proposals that may occur in the region (i.e., a cumulative assessment), whether by Alta Gas or by other applicants
- Partial Project Approval: Some impacts may be mitigated by not building any roads or turbines on the western slopes of Walker Ridge or in the Baldy Mountain region.

Conclusion:
Given the complicated natural resource issues in the Walker Ridge area, the significant public interest in the biological resources, wilderness characteristics, conservation values of this area, and new information developed over the past five years, it is clear that the No Action alternative, or the designation of an Area of Critical Environmental Concern for the entire Walker Ridge Unit as proposed by the California Native Plant Society, must be considered as reasonable alternatives to the proposed project, and should be identified as the preferred alternative in the EIS. In addition, these alternatives avoid the unacceptable public health risk of additional mercury contamination that result from all activities involving massive industrial scale development and earth movement on Walker Ridge.

Tuleyome reserves the right to submit additional comments as new information becomes available.

Please provide Tuleyome with copies of all phone conversation notes, meeting notes, emails, or written correspondence with regards to the proposed wind development project on Walker Ridge. We also ask again that we be included on all notification lists.

Sincerely,

Bob Schneider
Senior Policy Director
530-304-6215
bschneider@tuleyome.org

Andrew Fulks
President
530-219-7618
afulks@tuleyome.org

cc: Robert Abbey, Director, Bureau of Land Management
cc: Jim Abbott, Acting California State Director, Bureau of Land Management
cc: Steve Black, Counselor to the Secretary, U.S. Department of the Interior
cc: Kathy Hardy, District Manager for Central California, Bureau of Land Management
cc: Ashley Conrad-Saydah, Renewable Energy Project Manager, Bureau of Land Management
cc: Scott Flint, Climate Change/Renewable Energy Branch, CA Department of Fish and Game

January 2, 2010

Rich Burns
Ukiah Field Office
Bureau of Land Management
2550 North State Street
Ukiah, CA 95482
(707) 468-4070
Richard_Burns@ca.blm.gov

Re: Walker Ridge Industrial Wind Development and Toxic Mercury Liability Risk Issues

Dear Rich,

Many times we have discussed issues of abandoned mines and toxic mercury (Hg) contamination on BLM lands in the Putah and Cache Creek watersheds. As you know, the Cache Creek watershed contributes one half of the mercury loading to the Sacramento River system; one of the prime sources for that contamination is abandoned mines and tailings on BLM public lands.

We recently discussed this in regards to working together with the Central Valley Water Board to move forward on the Rathburn-Petray Mine clean up. We look forward to assisting in any manner that we can.

Tuleyome is very concerned with a number of mercury-related issues in addition to the problem of contaminated mine sites, including the potential that methylmercury issues may adversely impact ecological restoration in the Delta and San Francisco Bay, as well as health-related impacts to subsistence fishers. Quite clearly issues of mercury contamination and release are regional and long-term in significance.

This year Indian Valley Reservoir (IVR) was listed as a water body impaired for mercury in the 303d listing process. While sources for mercury and methylmercury contamination at IVR are not known at this time, it is probable that the serpentinitic soils and rocks on BLM public lands on the west side of Walker Ridge are a source.

Mercury is a toxic legacy issue that will cost taxpayers millions of dollars to address. This was pointed out in a recent AP article on mercury contamination in the Inner Coast Range; and was discussed at the recent Congressional House Subcommittee on Energy

and Mineral Resources Oversight Field Hearings that focused on Abandoned Mines and Mercury.

The Canadian developer Alta Gas has proposed an industrial wind development project on Walker Ridge that includes what can only be termed major serpentinite soil and rock disturbance. Clearly this proposal has a significant potential to exacerbate mercury problems in the Cache Creek basin, exposing both the BLM and the taxpayer to substantial liability risk.

We have been in touch with USGS scientists to gather background information on this issue. One of the directives at the USGS is to provide unbiased science that supports policy.

It is Tuleyome's understanding that a comprehensive risk assessment of such a proposed project (under NEPA; we presume that the BLM has a similar requirement for agency practice in considering proposed actions) would need to include a characterization of the soil and rock that will be disturbed and an analysis of potential transport, transformation (i.e. methylation), and bioaccumulation of the mercury. If there are elevated concentrations of total Hg in the soil, but little risk of methylation because of watershed conditions, then the overall risk to the ecosystem and human receptors (through the most likely pathway, consuming sport fish) would be low. Conversely, even if the total Hg concentrations are moderate or "background," increased transport to local streams, especially those with wetlands or other methylating environments, would probably lead to increased methylmercury exposure and bioaccumulation.

According to USGS scientists, a suitable assessment might involve the determination of reactive mercury (II) along with total and methyl forms in soils and suspended sediment during runoff events. A sediment transport study might be needed to characterize the contribution of the proposed project to the Cache Creek system.

The risk assessment of a project as proposed should also take into account some other factors in addition to mercury:

- While mercury is associated with some of the serpentinite in this region, chromium is always associated with serpentinite. This in itself is a potential risk.
- Asbestiform minerals are often associated with serpentinite. These minerals can be mobilized through road building and other activities that disturb serpentine soils.
- Serpentine soils are highly susceptible to erosion and are challenging to revegetate once disturbed.
- Mercury and chromium mine tailings in the area should be considered a hazard.

Recommendations:
The potential liability risk from toxic mercury contamination to the BLM and taxpayers resulting from development on Walker Ridge is a very serious issue with long term ramifications.

Tuleyome strongly recommends that the BLM immediately withdraw Walker Ridge and any other similar area as appropriate development locations for any soil-disturbing proposals.

Thank you for your attention to this matter.

Sincerely,

/s
Andrew Fulks
President
(530) 219-7618
afulks@tuleyome.org

/s
Bob Schneider
Senior Policy Director
(530) 304-6215
bschneider@tuleyome.org

cc:
Congressman Mike Thompson- Brad Onorato, Jonathan Birdsong
Senator Barbara Boxer- Stacey Smith, Megan Miller
Senator Diane Feinstein- Gina Banks, Leah Russin
Chair Marshall McKay, Yoche Dehe Wintun Nation
State Senator Lois Wolk
State Senator Pat Wiggins
Assembly Member Mariko Yamada
Assembly Member Wes Chesbro
Lake County Supervisor Denise Rushing
Colusa County Supervisor Gary Evans
Jim Abbott, BLM
Pamela Creedon, Central Valley Water Board

February 18, 2010

Kathy Hardy
BLM District Manager- Central CA
2800 Cottage Way, W-1623
Sacramento, CA 95825
kathryn_hardy@blm.gov

Rich Burns
Bureau of Land Management
Ukiah Field Office
2550 North State Street
Ukiah, CA 95482
Richard_Burns@ca.blm.gov

Re: Follow-up to February 10, 2010, meeting on Walker Ridge; also generally large soil-disturbing projects on potentially mercury- and chromium-laden serpentinite soils and rock

Dear Kathy and Rich,

Thank you and your staff for meeting with us on February 10, 2010, to discuss the Altagas wind energy project on Walker Ridge, as well as large soil-disturbing projects on potentially mercury- and chromium-laden serpentinite soils and rock in general. We found the meeting very helpful.

Tuleyome supports renewable or sustainable energy development when the effects of the generation are commensurate with protecting important environmental resources. However, Tuleyome recognizes that energy development projects are not necessarily environmentally benign, and generally such projects are not appropriate in potentially toxic locations or particularly sensitive ecological areas.

We appreciate that you recognize the potential toxic issues that can result from the disturbance of soils in the Walker Ridge area and elsewhere in the region where serpentinitic substrates occur. While we agree with Jim Wiegand that one should only extrapolate from one area to another very carefully with respect to scientific studies of mercury release and toxicity, we believe that we all recognize the potential liability at Walker Ridge and the need for thorough studies to characterize the potential hazards of development in the area, including mercury and chromium soil content and potential for soil mobilization in a highly unstable region.

We want to ensure that we will not exacerbate a serious problem with mercury contamination that is currently costing taxpayers millions of dollars to control and clean up. The Rathburn-Petrey Mine clean-up on the east side of Walker Ridge is the latest example. Of course, it might be argued that the 2009 Clean Water Act 303(d) listing of Indian Valley Reservoir on the west side of Walker Ridge is equally alarming.

While not a primary focus in the meeting we also discussed the need understood need to analyze for asbestos minerals.

Tuleyome urges that all projects with the potential for disturbing large areas of soil and rock, on Walker Ridge and elsewhere, should be halted until toxic studies are completed. **Let's address this very basic and compelling issue first.** Walker Ridge should be withdrawn from consideration for wind development until these studies are completed. This should be done before any project development work is done on the ground, and prior to drafting documents for the NEPA process for any proposed project.

It is our understanding that you agreed that these studies need to be completed but that they would be addressed through the NEPA process. We are concerned that delaying the completion of the necessary studies until the NEPA process is underway will cause an impetus toward project approval that may not be in the public interest.

We also emphasize that we strongly feel that a trusted, independent, impartial, scientific entity (such as the United Stated Geological Survey, or USGS) should undertake these studies. They should be contracted directly by the BLM, rather than by the applicant. The USGS has the necessary expertise as well as experience in the watershed, and we believe that having the USGS carry out the technical studies will help to obviate conflicts of interest over public values.

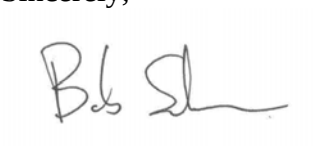
With respect to wind development on Walker Ridge, we touched on several other issues at our meeting that will need to be addressed. In particular there is a need to analyze fire hazards. As was mentioned, wind turbines in Altamont Pass have caused numerous fires. This is a very serious issue in an area like Walker Ridge. The recent Walker Ridge Fire (2008) demonstrates how even a small spark can spread in a chaparral plant community to become a large, hot fire that is difficult and costly to control. In addition to the ecological damage that results from such fires, they can decompose cinnabar and free mercury to the atmosphere.

While our meeting and this letter focus on the toxic mercury and chromium dangers, we want to note that in our previous letters we have identified the unique ecological importance of Walker Ridge, which is related to its serpentinite geology. It is a very special place. Should the BLM decide to proceed with wind development you must require the strictest and most comprehensive ecological studies. **These studies must be completely transparent, with full disclosure of the results and no confidentiality clauses in contracts for the work.** One approach to beginning this work might be to

directly fund the multi-year proposal by Dr. Ellen Dean and Craig Thomsen to undertake botanical studies on Walker Ridge.

Again, thank you for meeting with us. We greatly appreciate the work of the BLM in protecting the public resources of the Berryessa Snow Mountain region.

Sincerely,



Bob Schneider
Senior Policy Director
bschneider@tuleyome.org
530-304-6215

cc:
Congressman Mike Thompson- Brad Onorato, Jonathan Birdsong
Senator Barbara Boxer- Stacey Smith, Megan Miller
Senator Diane Feinstein- Gina Banks, Leah Russin
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State Senator Lois Wolk
State Senator Pat Wiggins
Assembly Member Mariko Yamada
Assembly Member Wes Chesbro
Lake County Supervisor Denise Rushing
Colusa County Supervisor Gary Evans
Jim Abbott, BLM
Pamela Creedon, Central Valley Water Board

December 22, 2009

Rich Burns
Ukiah Field Office
Bureau of Land Management
2550 North State Street
Ukiah, CA 95482
(707) 468-4070
Richard_Burns@ca.blm.gov

Re: Proposed Walker Ridge Wind Development

Dear Rich,

Tuleyome, other groups, and citizens have a strong interest in Walker Ridge. The region between Walker Ridge Road and Indian Valley Reservoir has been proposed in the Citizen's Wilderness Inventory (see: http://www.energy.ca.gov/reti/documents/phase2A_final/maps/CA_CREZ_Conceptual_Transmission_Segments_New_and_Existing_Corridors.pdf) as a potential wilderness area and the entire 14,000-acre Walker Ridge unit was proposed by the California Native Plant Society in 2005 as an Area of Critical Environmental Concern. Tuleyome supports both of these proposed designations.

In addition, in the region east of Indian Valley Reservoir, Tuleyome has identified elements of a significant conservation landscape linkage through the inner Coast Range, which we believe constitutes an element in the major migratory bird pathway west of the Central Valley. The potential effects of this proposed wind development on that migration corridor will be an essential element in how the BLM addresses the project. This is particularly important to Tuleyome as an element in our concern about how regional conservation values are being and will be affected by climate change and is one of the primary concerns in the proposal for a Berryessa Snow Mountain National Conservation Area. Consequently we request that the BLM evaluate the potential conservation impacts of wind energy projects in the region, including how this project and any others that are under consideration will affect potential responses to climate change.

We have asked previously to be informed of all communications in the region with respect to wind development, and in fact we specifically requested this on September 15, 2009 with respect to the proposed geotechnical testing proposed by Alta Gas. As we

discussed in our phone conversation, through an oversight on the part of BLM staff, our comments were not addressed and the decision was made irrespective of our concerns. We would like assurances from the BLM that omissions like this will not reoccur.

We were informed by Alta Gas that a field meeting was held on December 7th-8th with the BLM and other agencies. We were not informed of this meeting but would like to be informed of and invited to participate in all future meetings. We would also like copies of all BLM notes taken at that meeting and all other communications made to date with Alta Gas and their representatives, including emails, faxes, telephone conversations and meeting notes.

On December 9, 2009, representatives from Alta Gas, Environment and Ecology, and Perry Communication met with Tuleyome, a representative from CNPS, and individuals from UC Davis in order to discuss their proposed wind development project. We appreciate their time and the description of their project. It is clear that this proposed development will have very significant impacts (short-term and permanent construction impacts, and long-term management effects) to the incredibly unique biological diversity, cultural, aesthetic, recreational, and other values associated with Walker Ridge. In addition, there may be impacts from mercury mobilization and contamination on both sides of the ridge.

The region is rich in archeological and cultural sites of particular importance to tribes in the region.

At this time we are particularly concerned about the proposed biological survey for the region. It is clear from the list of project elements as identified by the applicant and the range of alternatives that must be fully analyzed that the biological survey needs to encompass the entire 14,000-acre region. In addition, because of the rich biological diversity associated with the serpentine soils of the region and the seasonal variability in weather and climate, the surveys require more than a single year's sampling. We have reason to believe that a minimum of 3 years of biological study is necessary to accommodate the variability that occurs in the region, and request that the BLM identify this as a requirement for the industrial wind development project. Moreover, wildlife studies require more than one year of use data to properly evaluate the population status of species that may be affected by a project of this magnitude.

We are also concerned about the geologic and soils stability in the region. As you are aware a large potential landslide hazard exists ¼ mile below the Indian Valley Reservoir. This type of slip can also occur along both sides of Walker Ridge. In particular, this may threaten Indian Valley Reservoir. Any further development on or along Walker Ridge must have very detailed studies to assess this potential hazard.

It is clear that the biological diversity of the Walker Ridge region is extraordinary for its serpentine soils and associated plant communities, and wildlife migratory routes. In contrast, it is our understanding that wind energy at this site is relatively low. The potential for significant environmental damage relative to the limited wind energy

potential must be analyzed and contrasted with respect to alternative locations on a regional and statewide basis.

There are several other Alternatives that must be fully analyzed in the NEPA document. They include but are not limited to:

- No Action
- Designation of a 14,000-acre Area of Critical Environmental Concern as proposed by the CNPS
- Designation of a 5,000-acre federal wilderness area on the west side of Walker Ridge
- Management of the Citizen's Wilderness Inventory for its wilderness characteristics
- Development of a wind development with 29 towers, new spur roads, a substation, a new transmission line, road widening, and additional short and long term structures (note that Tuleyome is concerned that this not be considered an "all-or-none" project, and the potential for reducing impacts by reducing the extent of the development must be included in the BLM's assessments)
- An assessment of all other potential wind energy development proposals that may occur in the region (i.e., a cumulative assessment), whether by Alta Gas or by other applicants

In assessing alternatives we wish to call your attention to the USEPA Region IX letter from Ms. Ann McPherson to Holly L. Roberts of the BLM Palm Springs-South Coast Field Office dated December 11, 2009, regarding the Proposed Chevron Energy Solutions/Solar Millennium Blythe Solar Power Project. Ms. McPherson's letter recommends that an alternatives analysis analyze the feasibility of distributed generation and increased energy efficiency as an alternative to the proposed project. The alternative section is included as Attachment 1.

Conclusion

Please ensure that Tuleyome is informed with respect to all actions on Walker Ridge, including all actions involving wind development.

We thank you and your staff for your work in managing the public lands in this region.

Sincerely,

Andrew Fulks
President
Tuleyome

Bob Schneider
Senior Policy Director
Tuleyome

Greg Suba
Conservation Program Director
California Native Plant Society

Ryan Henson
Policy Director
California Wilderness Coalition

Dr. Michael Barbour

Dr. Susan Harrison

Dr Sam Bledsoe

Dr. Eldridge Moores

Dr. Chad Roberts
Consulting Conservation Planner
Roberts ECP LLC

Dr. Glen Holstein
Botanist, Sacramento Valley Chapter
California Native Plant Society, and
Yolo Natural Heritage Program Steering
Committee member

Jim Eaton
Tuleyome

Alice Bond
California Policy Analyst
The Wilderness Society

Victoria Brandon
Sierra Club Lake Group

Pam Nieberg
Sierra Club Yolano Group

Dr. John Hunter

cc:
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State Senator Pat Wiggins
Assembly Member Mariko Yamada
Assembly Member Wes Chesbro
Lake County Supervisor Diane Rushing
Colusa County Supervisor Gary Evans
Jim Abbott, BLM
Pamela Creedon, Central Valley Water Board

Attachment 1

From USEPA Region IX letter from Ms. Ann McPherson to Holly L. Roberts of the BLM Palm Springs-South Coast Field Office dated December 11, 2009

Alternatives Analysis

The National Environmental Policy Act (NEPA) requires evaluation of reasonable alternatives, including those that may not be within the jurisdiction of the lead agency (40 CFR Section 1502.14(c)). A robust range of alternatives will include options for avoiding significant environmental impacts. The DEIS should provide a clear discussion of the reasons for the elimination of alternatives which are not evaluated in detail. Reasonable alternatives should include, but are not necessarily limited to, alternative sites, capacities, and technologies as well as alternatives that identify environmentally sensitive areas or areas with potential use conflicts. The alternatives analysis should describe the approach used to identify environmentally sensitive areas and describe the process that was used to designate them in terms of sensitivity (low, medium, and high).

The environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public (40 CFR 1502.14). The potential environmental impacts of each alternative should be quantified to the greatest extent possible (e.g., acres of wetlands impacted, tons per year of emissions produced).

Recommendations:
The DEIS should describe how each alternative was developed, how it addresses each project objective, and how it would be implemented. The alternatives analysis should include a discussion of alternative sites, capacities, and generating technologies including different types of solar energy technologies, and describe the benefits associated with the proposed technology.

The DEIS should clearly describe the rationale used to determine whether impacts of an alternative are significant or not. Thresholds of significance should be determined by considering the context and intensity of an action and its effects (40 CFR 1508.27).

The DEIS should discuss the feasibility of using residential and wholesale distributed generation, in conjunction with increased energy efficiency, as an alternative to the proposed project.

Water Resources

Water Supply and Water Quality

The DEIS should estimate the quantity of water the project will require and describe the source of this water and potential effects on other water users and natural resources in the project's area of influence. The DEIS should clearly describe existing groundwater conditions, potential cumulative impacts to groundwater quantity and quality, and avoidance measures to prevent impacts. The DEIS should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to this resource. Specifically, the potentially-affected groundwater basin

2

To: Rich Burns, Manager of BLM Field Office Ukiah, CA
From: L. Martin Griffin Jr., M.D., M.P.H. (415-435-4755)
Re: Walker Ridge Wind Energy Project

In response to your NOP for this project, I'm submitting the following:

1. I am acquainted with the Bear Valley Ranch owned by the Gabrielsen's, which borders the BLM land where some 29-42 , 500 ft. high wind generators are planned for the Walker Ridge. I understand the NOP ends 10/13/10.

2. I am well-qualified to comment on this massive wind machine installation. I am a graduate of University of California with degrees in Zoology, (ornithology) and Botany. I am the founder of Audubon Canyon Ranch, a system of four wild-life preserves totaling some 4500 acres, located with headquarters at the Martin Griffin Preserve on Bolinas Lagoon. This 1000-acre preserve is the home of one of the largest colonies of egrets and herons on the North Coast. It is the center of one of the largest Audubon winter bird count of resident and migratory birds. We operate a bird research center on Tomales Bay at our 450-acre Cypress Grove Preserve; we also own the 570-acre Bouverie Audubon Preserve in Sonoma Valley on the southern Mayacamas Ridge; we manage the Modini-Ingalls Preserve in the Russian River watershed high on the Mayacamas Ridge. We are well acquainted with migratory birds and the hazards of wind machines.

3. We publish the Ardeied, which is devoted to conservation science and habitat protection on the ACR Preserves.

4. We may take over management of Mayacamas Audubon Preserve adjoining our Modini-Ingalls Preserve, protecting some 12,000 acres along the Mayacamas Ridge.

5. These latter preserves on the Mayacamas Ridge in Sonoma County border Napa County and are not far from the Walker Ridge Wind Energy Project.

6. For your scientific studies in preparation for the DEIS we request that you involve Audubon California, whose executive director is Graham Chisholm, phone 510-601-1866.

7. We also ask you to involve the National Audubon Society, John Flicker, President, Glen Olson, Bird Conservation and Advocacy, (Audubon.org) and utilize their data on bird deaths from wind machines.

8. We also request that you involve the Ornithology Department at the University of California at Davis, if they're not already involved.

9. I believe that this long linear row of wind machines 500-ft high, will be aesthetically ruinous for Bear Valley, and kill thousands of birds, including raptors and songbirds, since this is a migratory pathway. Please study this.

10. Please study the impacts of erecting these gigantic wind machines on the associated roads, structures, and especially the groundwater supply for Bear Valley and other ranches.

11. As you know the Gabrielsen 12,000-acre ranch is an organic beef and wildlife protection farm with controlled grazing to benefit a spectacular native wild flower display, which brings visitors from all over California and the nation. The long line of wind machines will ruin the natural aesthetics and viewscapes.

12. Will the warning lights atop the wind machines disorient migratory birds, which often fly long distances at night?

13. As a lifetime defender of all types of birdlife, I request that you deny this huge commercial project and find a less-sensitive area.

Sincerely,

L. Martin Griffin Jr., M.D., M.P.H.

Ms. Constance Turner
1110 Loma Ave
Coronado, CA 92118-2836

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil

on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

NO development in the Walker Ridge area!!!!!

Sincerely,
Ms. Constance Turner

Ms. Kristin Hurley
13243 Aubrey St
Poway, CA 92064-3322

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Comments Regarding the Environmental Impact Statement for the Walker Ridge Wind Project

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

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The Walker Ridge area is also part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south. The proposed Walker Ridge wind farm poses a potentially significant impact to migratory bats, and there is evidence that this area is critical for migrating birds as well.

Furthermore, five rare butterflies species are found at Walker Ridge. These butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies needs review and input by the scientific community before such a project can proceed.

Another concern is large-scale earth movement, including wind-tower pad development and road grading, which would disturb and mobilize mercury-laden soils in the area, creating a potential public health hazard as well as increasing sedimentation, the primary route of mercury discharges, into nearby water sources.

Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, and a large public and private investment of $1.5 million purchased a conservation easement in order to protect the scenic, conservation, and working landscape values in perpetuity. The region provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation. Ultimately, large contiguous

natural areas, such as the region surrounding Walker Ridge, provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas already disturbed by industrial use, agricultural lands, and lands with low resource values.

Thank you again for considering my comments.

Sincerely,
Ms. Kristin Hurley

Mr. H. Blumenthal
2773 Avery Ln
Eureka, CA 95501-3304
(707) 443-3795

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

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-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil

on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation. I am all for renewable energy efforts in California and the country.
But this is a 'no brainer'. It is the antithesis of what renewable energy supporters want if its placement would destroy and endanger so much of what we value and strive to protect year to year and day by day!

Sincerely,
Mr. H. Blumenthal

Mr. Jared Laiti
502 Redwood Ave
Sacramento, CA 95815-2423

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

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The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats,already threatened by recent epidemics, from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,
Mr. Jared Laiti

Dr. Leslie Friedman
2565 Washington St
Apt 4
San Francisco, CA 94115-1828

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal. I urge you to oppose this wind project in this place.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds. I am aware that mentioning bats often only gets a laugh. However, bats are responsible for pollinating many crops for human consumption and also for devouring literally tons of insects harmful both to crops and to humans. Our agriculture is dependent on these pollinators. Endangering bats endangers humans; it is a simple, direct relationship.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

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-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.
For reasons directly connected to human health in addition to preservation of wildlife and natural beauty, I urge you to oppose this wind project. There are other, more suitable places for it.

Sincerely,
Dr. Leslie Friedman

Ms. Carol Edgerton
1600 Jenkinson Dr
Concord, CA 94520-4217

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Please put the environment first! Look around and see the devastation caused by "safe" exploration.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

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-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can

proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

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-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,
Ms. Carol Edgerton

Ms. Mary Ann Gardner
3900 W Tulare Ave
Apt 64
Visalia, CA 93277-1742

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as lands with low resource values, agricultural lands, and areas already disturbed by industrial use.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies, and damselflies needs review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitutes a potential public health hazard if further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road-grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

- Since the Walker Ridge area contains lands with wilderness characteristics, it must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge, provide our best hope for addressing loss of species and open space, preserving water quality, and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Thank you for your consideration.

Sincerely,
Ms. Mary Ann Gardner

Ms. Jamaka Petzak
1222 Graynold Ave
Glendale, CA 91202-2021

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed. As all species are truly interconnected, what affects one ultimately affects all, even our own; so we need to exercise wisdom and caution when contemplating development plans.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation. For all these important reasons, please do not develop Walker Ridge.

Sincerely,
Ms. Jamaka Petzak

Ms. Karen Garland
160 Thomaston St
Rockland, ME 04841-2154
(207) 594-9308

Oct 10, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

I firmly believe in, and am committed to, the expanding of renewable energy. However, as an avid hiker and nature enthusiast, I am opposed to this particular plan for the following reasons.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs

review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,
Ms. Karen Garland

Mr. Kevin Crupi
146 Midway Dr
Negaunee, MI 49866-9680

Oct 11, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Comments on the Walker Ridge Wind Project in California

Dear Rich Burns,

I'm writing to urge the BLM to protect Walker Ridge's special resources. This area in California is too wild to develop and should be left alone for the benefit of future generations.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. Although I strongly support responsible renewable energy development, some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat that provides connectivity from the Klamath-Siskiyou region and the Mendocino National Forest to the north, through to the Cache Creek Wilderness Area and Knoxville public lands to the south.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,
Mr. Kevin Crupi

Mr. Derrick Canton
3236 Valley Forge Dr
Stockton, CA 95209-2131

Oct 13, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Comments On Walker Ridge Wind Project

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Please protect this area and do not proceed with the proposed project.

Wind energy development is inappropriate at this site for the following reasons:

There is question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed and the presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands may constitute a potential public health hazard should further disturbances occur to ridge landscapes.

Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

Again, please do not proceed with the Walker Ridge Wind Project, and, instead, protect the area.

Thank you very much.

Sincerely,
Mr. Derrick Canton

Mr. Robert Mason
12033 Califa St
Valley Village, CA 91607-1201
(626) 628-5753

Oct 13, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat.

-There are potentially significant impacts to migratory bats from the proposed Walker Ridge wind farm. And there is evidence that this area may be critical for migrating birds.

-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

-The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any

irrevocable commitments.

-Walker Ridge is adjacent to Bear Valley, a renowned wildflower area, where a large public and private investment of $1.5 million purchased a conservation easement to protect the scenic, conservation, and working landscape values in perpetuity.

-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,
Mr. Robert Mason

Mr. Robert Mason
12033 Califa St
Valley Village, CA 91607-1201
(626) 628-5753

Oct 13, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

-The Walker Ridge area is part of an important wildlife corridor of unbroken natural habitat.

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-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

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-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,
Mr. Robert Mason

Mr. Misha Popov
5431 Auburn Blvd
Sacramento, CA 95841-2801
(410) 451-5926

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

Wind energy development is inappropriate at this site for the following reasons:

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-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

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loss of species and open space, preserving water quality and adapting to climate change.

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Sincerely,
Mr. Misha Popov

Ms. Eileen Karsten
78650 Ave 42nd #1908
Bermuda Dunes, CA 92203
(760) 567-9944

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

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-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

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loss of species and open space, preserving water quality and adapting to climate change.

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Sincerely,
Ms. Eileen Karsten

Mr. Michael Zelner
646 Kennedy St Apt 110
Oakland, CA 94606-5320

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

Thank you for the opportunity to comment on the Walker Ridge Wind Project proposal.

Walker Ridge is a special and fragile place with outstanding biological, ecological, geological, scenic, and wilderness qualities. I support responsible renewable energy development, but some places are inappropriate for development of any kind. Walker Ridge is simply too wild to develop. The proposed Walker Ridge Wind Project threatens this area's biological resources, water quality, scenic beauty, wilderness characteristics, and the overall conservation values of the region.

The BLM should protect this scenic and special area and not proceed with the proposed project. California needs new renewable energy, but appropriate locations for large wind farms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.

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-Five rare butterflies are found at Walker Ridge. Butterflies are of particular concern because they frequently aggregate on hilltops as an essential part of the mate-finding process.

-The question of how wind towers may affect the air and flight column for birds, bats, butterflies, dragonflies and damselflies that needs review and input by the scientific community before such a project can proceed.

-The presence of mercury (and chromium) in serpentine rocks and soil on Walker Ridge and other adjacent lands constitute a potential public health hazard should further disturbances occur to ridge landscapes. Large-scale earth movement, including wind-tower pad development and road grading could mobilize mercury-laden soils, as well as increase sedimentation--the primary route of mercury discharges--into nearby water sources.

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-Large contiguous natural areas, such as the region surrounding Walker Ridge provide our best hope for addressing

loss of species and open space, preserving water quality and adapting to climate change.

-The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.

Sincerely,
Mr. Michael Zelner

Ms. Joanne R. Johnson
2279 Via Mariposa W Unit P
Laguna Woods, CA 92637-2102

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

Dear Rich Burns,

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Sincerely,
Ms. Joanne R. Johnson

Mr. Mickey Lund
655 Montgomery St Ste 1000
San Francisco, CA 94111-2629

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Ms. Liana Lovas
1824 260th St
Lomita, CA 90717-3305

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Ms. Michelle Palladine
471 E Tahquitz Canyon Way
Palm Springs, CA 92262-6620

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Ms. Michelle Palladine

Ms. Annabelle Travis
5926 Hillside Dr
El Sobrante, CA 94803-3614
(510) 669-0708

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Mrs. Sidney Robles
1129 Stonybrook Dr
Napa, CA 94558-5220

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Miss Brittany Adams
369 Missouri St
San Francisco, CA 94107-2819

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Ms. S. Hodges
5151 F St
Sacramento, CA 95819-3223

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PO Box 1730
Twain Harte, CA 95383-1730
(209) 586-7405

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Mr. Seth Laursen
1829 S Cloverdale Ave
Los Angeles, CA 90019-5217
(323) 935-3264

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Ms. joy sweeny
1477 Tyler Park Way
Mountain View, CA 94040-3796
(650) 961-9503

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Sincerely,
Ms. joy sweeny

Mr. Dan Esposito
1510 Rowell Avenue
Manhattan Beach, CA 90266
(310) 546-3737

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Mr. Patrick Herman
619 W 1st St
Oxnard, CA 93030-5604

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Mr. Sam Child
1313 Ocean Front Walk
Venice, CA 90291-3685

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Mr. Sam Child

Mr. John Delaney
285 N Ventura Ave Apt 11
Ventura, CA 93001-4533

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Mr. John Delaney

Ms. brenda tobin
PO Box 77841
Corona, CA 92877-0128

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5015 Greenbrier Ave
San Diego, CA 92120-1112

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Mr. Martin Marcus

Ms. Rebecca Barker
19655 Rotterdam St
Riverside, CA 92508-6183

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Ms. Sibylle Hartmann
PO Box 59405
San Jose, CA 95159-0405

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Ms. Rebecca Finley
14 E Valerio St Apt 1
Santa Barbara, CA 93101-2528

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Mrs. Laura Herndon
125 N Brighton St Apt 231
Burbank, CA 91506-2356

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Ms. Linda Trevillian
2216 Westminster Ave
Alhambra, CA 91803-3727

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Sincerely,
Ms. Linda Trevillian

Ms. E Perkins
PO Box 178
Talmage, CA 95481-0178

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Ms. Virginia Williams
719 Pierino Ave
Sunnyvale, CA 94086-8520

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Mr. Eric Grant
316 15th St
Sacramento, CA 95814-1022
(916) 448-8699

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Mr. Warren Hageman
7944 Pebble Beach Dr Apt 107
Citrus Heights, CA 95610-7772

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510 Hiller St
Belmont, CA 94002-2523

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Mr. Brent Han
777 San Antonio Rd
Palo Alto, CA 94303-4827
(650) 857-0943

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41 Grandview St Apt 801
Santa Cruz, CA 95060-3096
(831) 426-0234

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Mr. Anje Waters
PO Box 2521
Nevada City, CA 95959-1949
(530) 274-2133

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Mr. Don Meehan
1714 Merrill Dr
San Jose, CA 95124-5939

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Sincerely,
Mr. Don Meehan

Ms. Wendy Mashburn
4105 Duquesne Ave Apt 2
Culver City, CA 90232-2840
(310) 838-9839

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Ms. Wendy Mashburn

Mrs. Linda Whetstine
13423 Silver Lake Dr
Poway, CA 92064-3714

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2550 North State Street
Ukiah, CA 95482

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Mrs. Christina Heon
136 S Halcyon Rd
Arroyo Grande, CA 93420-3116

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Mrs. Christina Heon

Miss Leticia Bayona
2760 Britt Ct
San Jose, CA 95148-2521

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2550 North State Street
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Mrs. Stephanie Linam
801 Oxford Way
Benicia, CA 94510-3643

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Ms. Merrily Robinson
952 Ruby St
Redwood City, CA 94061-1430
(650) 368-4320

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Ms. anne veraldi
21 lapidge
sf, CO 94110

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Ms. anne veraldi

Mr. Dirk Obudzinski
1231 6th Ave
San Francisco, CA 94122-2501

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Ms. Kate Stemig
1234 Huijn
Los Angeles, CA 90045

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Mr. David Root
255 G St
341
San Diego, CA 92101-6808

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Ms. Mia Distasi
250 Coggins Dr
Pleasant Hill, CA 94523-4464

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Mrs. Judy Bradford
5122 Oconto Ave
Rancho Palos Verdes, CA 90275-3733
(310) 541-2117

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Sincerely,
Mrs. Judy Bradford

Mr. Albert Moreno
6350 Riverside Blvd
Apt 335
Sacramento, CA 95831-1140

Oct 7, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Mr. Albert Moreno

Ms. Rose Dallal
2603 Milvia St
Berkeley, CA 94704-3220
(510) 735-7410

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Ms. Luna Gooding
606 Venezia Ave Apt A
Venice, CA 90291-4898

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Ms. Sara Gigliotti
448 Laurel St Apt 4
San Francisco, CA 94118-1920
(415) 563-8918

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Dr. Beatrix Schramm
1846 Oliver Ave
San Diego, CA 92109-5491

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Ms. Teresita Callen
13025 Lincoln Way
Apt 98
Auburn, CA 95603-4152

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Ms. Jacqueline Lasahn
6262 Bernhard Ave
Richmond, CA 94805-1645

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Miss Jamie Conrad
12951 Aurora Dr
San Leandro, CA 94577-3158

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Ms. Sakura Vesely
4432 Actriz Pl
Martinez, CA 94553-1456

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Mr. Fred Rinne
642 Cayuga Ave
San Francisco, CA 94112-1917

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PO Box 7105
Cotati, CA 94931-7105

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2027 Mission St Apt 411
San Francisco, CA 94110-1245

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Sincerely,
Mr. Ron Avila

Mr. zack thomsen
484 Olive Ave
Fremont, CA 94539-5263

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Mr. zack thomsen

Ms. Marion Barry
9696 Junewood Ln
Loomis, CA 95650-8875
(916) 663-3643

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Mr. John Douglas
PO Box 8552
Goleta, CA 93118-8552

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Ukiah, CA 95482

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Mr. John Douglas

Ms. Sigrid Ramos
14836 Hart St
Van Nuys, CA 91405-3019
(818) 989-2394

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2550 North State Street
Ukiah, CA 95482

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Ms. Sigrid Ramos

Miss STACIE CHARLEBOIS
2829 Bay Village Ave
Santa Rosa, CA 95403-2486

Oct 8, 2010

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Ukiah, CA 95482

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Mr. Robert Andrade
5945 Happy Pines Dr
Foresthill, CA 95631-9634

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1963 Folsom Street
San Francisco, CA 94103

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5675 N Fresno St
Fresno, CA 93710-6066

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Ms. Barbara Voss
10441 Darling Rd
Ventura, CA 93004-2471

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Ms. Carol Sawyers
3710 Gross Rd
Spc 29
Santa Cruz, CA 95062-2044

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2550 North State Street
Ukiah, CA 95482

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Ms. Carol Sawyers

Mrs. Diane Densley
20172 Cape Cottage Ln
Huntington Beach, CA 92646-4406

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Ms. Corri Stephenson
1726 W 99th Ct
Crown Point, IN 46307-5407

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Sincerely,
Ms. Corri Stephenson

Ms. Lois Corrin
1645 Grand Ave
Piedmont, CA 94611-4331
(510) 420-1534

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Ms. Karen Babcock
555 Front St Unit 903
San Diego, CA 92101-6775

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Ms. Amy Kaplan
1027 Coach Way
McKinleyville, CA 95519-8927
(916) 479-2217

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Ms. Lorena Wolfe
415 W 3rd St
Rialto, CA 92376-5701

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Dr. Randall Tyers
63 Oakvale Ave
Berkeley, CA 94705-2403

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255 G St
341
San Diego, CA 92101-6808

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Ms. Heather John
112 W 5th St
Los Angeles, CA 90013-1418

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2131 Vallejo Dr
Tustin, CA 92782-8618
(714) 731-1568

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Mr. Steve Rouch
soscol ave.
Napa, CA 94558

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Ms. Patricia Maddock
6104 Pickford Pl
Elk Grove, CA 95758-6117

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3941 Ecochee Ave
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Sincerely,
Dr. Nancy Schwartz

Mr. Nathan Myers
1424 Wake Forest Dr
Apt 208
Davis, CA 95616-8000

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Mr. Nathan Myers

Mr. Jim Koenig
1584 Whitaker St
White Bear Lake, MN 55110-3768
(651) 429-5439

Oct 8, 2010

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Ms. Kim Alexander
345 E Carson St # 163
Carson, CA 90745-2709
(424) 221-4134

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Mrs. Jennifer Bradford
1931 Englewood Dr
Lemon Grove, CA 91945-4209

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Mr. Chris Petrakis
1550 Amherst Ave Apt 102
Los Angeles, CA 90025-3698

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Ms. Millie Delaney
214 1/2 S School St
Grass Valley, CA 95945-6450

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Ms. Jelica Roland
M. Trinajstica 1
Buzet, None 52420

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Mr. Jack McClain
PO Box 2874
Sacramento, CA 95812-2874

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Ms. Megan Adam
4860 Reservation Rd
Placerville, CA 95667-9742

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Ms. Bryna Hoffmeister
112 E Maple St Apt 206
Bellingham, WA 98225-4399

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Ms. Karen Tiney
14823 Marquette St
Moorpark, CA 93021-2530

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Mr. Allan Campbell
3162 Isadora Dr
San Jose, CA 95132-1920

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Sincerely,
Mr. Allan Campbell

Ms. Jessie Osborne
770 Sycamore Ave Ste 122
PMB 425
Vista, CA 92083-7904

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Ms. Jessie Osborne

Mr. Tom Nulty jr
24500 Dana Point Harbor Dr
Dana Point, CA 92629-3050

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Mr. Tom Nulty jr

Ms. Priscilla Gilbert
267 Curtner Ave
Palo Alto, CA 94306-3471

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2550 North State Street
Ukiah, CA 95482

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Mrs. Jennifer Sellers
3901 Clayton Rd Apt 66
Concord, CA 94521-2531

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Mrs. Jennifer Sellers

Ms. Maria Bustamante
PO Box 2572
El Cerrito, CA 94530-5572
(323) 878-5541

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Ukiah, CA 95482

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Mr. John Chabowski
3342 Holly Branch Ct Apt 435
Sacramento, CA 95834-1844

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Dr. Phil Wells
114 Belmont St
Somerville, MA 02143-1509
(617) 776-7713

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Mrs. Ewa Bartos
24 5th Ave Apt 1015
New York, NY 10011-8880

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PO Box 3037
Big Bear Lake, CA 92315-3037

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Ms. Jennifer Robinson
715 S Vermont Ave
Los Angeles, CA 90005-1518

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715 S Vermont Ave
Los Angeles, CA 90005-1518

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Mr. Hans Deutsch
6755 Turnergrove Dr
Lakewood, CA 90713-2837

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Sincerely,
Mr. Hans Deutsch

Ms. Mindi White
PO Box 481185
Los Angeles, CA 90048-9440

Oct 8, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Ms. Susan Curtis
1762 E 3rd St Apt 15
Long Beach, CA 90802-3765

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Ms. Ds Powell
4511 Miami Way
San Diego, CA 92117-3821

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Mr. William Briggs
46 20th Ct
Hermosa Beach, CA 90254-2804
(310) 374-3546

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Ukiah, CA 95482

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Ms. Lauren OBrien
2322 California Ave
Santa Monica, CA 90403-4526

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Ms. Sandy Gilbert
20665 Nancy Ct
Cupertino, CA 95014-2913

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655 Washington St
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(650) 941-4240

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PO Box 210505
Chula Vista, CA 91921-0505

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2703 Corabel Ln Apt 215
Sacramento, CA 95821-5254
(916) 486-3602

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Ms. Claudia Wornum
11780 Cranford Way
Oakland, CA 94605-5812

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Sincerely,
Ms. Claudia Wornum

Ms. Donna Jones
20622 John Born Rd
Penn Valley, CA 95946-9713

Oct 9, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Ms. Donna Jones

Mr. John Satchell
4425 The Ct
Sacramento, CA 95821-2940

Oct 9, 2010

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2550 North State Street
Ukiah, CA 95482

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Mr. John Satchell

Dr. Yuko Nakajima
63 Oakvale Ave
Berkeley, CA 94705-2403

Oct 9, 2010

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2550 North State Street
Ukiah, CA 95482

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Mr. Dan Bell
2550 California Ave
Carmichael, CA 95608-5351

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2550 North State Street
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Mr. Dan Bell

Ms. Corinne Cather
4325 44th St
Sacramento, CA 95820-3927

Oct 9, 2010

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2550 North State Street
Ukiah, CA 95482

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Ms. Cynthia Adams
15 Beulah Dr
Santa Cruz, CA 95060-1552
(831) 469-9589

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Ms. karen linarez
5249 Manzanita Ave
Carmichael, CA 95608-0544

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Mr. les roberts
1134 E Lansing Way
Fresno, CA 93704-4335

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Mr. les roberts

Mrs. Theresa Shiels
178 El Granada Blvd.
El Granada, CA 94018

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Ms. Elaine Saldivar
4230 San Pablo Dam Rd Apt E31
El Sobrante, CA 94803-2959

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Ms. Jessica Wodinsky
12601 Everglade St
Los Angeles, CA 90066-1819

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Miss Deb Dearing
2986 Yulupa Ave
Santa Rosa, CA 95405-8694

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Sincerely,
Miss Deb Dearing

Ms. Ellen Koivisto
1556 La Playa St Apt 101
San Francisco, CA 94122-2856

Oct 9, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Ms. Ellen Koivisto

Mr. bruce mohr
10736 Gloria Ave
Cincinnati, OH 45231-1716

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Ukiah, CA 95482

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Mr. William Talbott
135 S Sunset Pl
Monrovia, CA 91016-2509
(626) 358-6326

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Ukiah, CA 95482

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Mr. William Talbott

Ms. Alycia gillespie
303 Windy Hills Rd
Dripping Springs, TX 78620-3571

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2550 North State Street
Ukiah, CA 95482

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Mrs. Joan Scott
5632 Cochin Ave
Arcadia, CA 91006-5707

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Miss tiesha adams
1525 N Edison St
Stockton, CA 95204-5629

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Miss Diane Bateson
10146 Owensmouth Ave
Chatsworth, CA 91311-2921
(818) 349-7259

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Mrs. Gaile Carr
1821 Eddy Dr
Mount Shasta, CA 96067-9617
(916) 926-4923

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17819 Sun Walk Ct
San Diego, CA 92127-1370

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Ms. Julie Beer
334 College Ave Apt E
Palo Alto, CA 94306-1518

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Mrs. Giovanna Martinez
5767 Santa Ynez Pl
Rancho Cucamonga, CA 91739-2242

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Sincerely,
Mrs. Giovanna Martinez

Mr. Joe Salazar
610 Cherrywood Dr
Santa Rosa, CA 95407-7514
(707) 546-8604

Oct 10, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Mr. Joe Salazar

Ms. Vic Bostock
17 Cliveden Green
Altadena, CA 910014552

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Ms. Catherine Gauthier
1483 31st Ave
San Francisco, CA 94122-3101

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Ukiah, CA 95482

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Mr. James Helsing
4024 Radford Ave
Studio City, CA 91604-2101

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Mr. Guy Lusher
702 Hereford Rd
Brookshire, TX 77423-9376

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Ms. Barbara Daniels
529 Firecrest Ct
Newbury Park, CA 91320-5022

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Ms. Marybeth Sharp
3100 Laurel Ave
Manhattan Beach, CA 90266-3438
(310) 545-2467

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Ms. Cecly Corhett
18307 Burbank Blvd Unit 329
329
Tarzana, CA 91356-2752
(818) 826-9562

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Mr. Scott Gabel
47 Cinnamon Teal
Aliso Viejo, CA 92656-1800

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Ms. D Rowe
2118 Wilshire Blvd # 259
Santa Monica, CA 90403-5704

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Sincerely,
Ms. D Rowe

Mr. Paul Hunrichs
8360 Carlton Oaks Dr
Santee, CA 92071-2206

Oct 10, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Mr. Paul Hunrichs

Ms. Olivia Dawson
3300 Grayburn Rd
Pasadena, CA 91107-4624

Oct 10, 2010

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Ukiah, CA 95482

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Ms. Leila Jackson
9921 Robbins Dr Apt 4
Beverly Hills, CA 90212-1619

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Ms. Leila Jackson

Ms. Margaret King
2110 Iroula Way
Tracy, CA 95377-2272

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Ms. alison merkel
5 Meadowlark Ln
Oak Park, CA 91377-1017

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Sincerely,
Ms. alison merkel

Mrs. Allyson Frye-Henderson
2770 Caminito Eldorado
Del Mar, CA 92014-3821

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612 Walnut Ave
Ukiah, CA 95482-4239

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Mr. Noah Schlager
116 Barn Rd
Belvedere Tiburon, CA 94920-2602
(415) 381-3251

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Mr. John Bigelow
349 Corbett Ave
San Francisco, CA 94114-1818

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Mrs. Paulina Ramirez B. Mazique
8463 De Soto Ave
Unit 16
Canoga Park, CA 91304-2771

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Ms. Kara Ayik
1142 Brownie Ct
Merced, CA 95340-0707

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401 Monroe St
Hoboken, NJ 07030-1774

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Sincerely,
Mrs. Christine Gorton

Mrs. Mira Duong
13227 E Guthrie Dr
Spokane Valley, WA 99216-2412
(509) 927-0297

Oct 11, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Ms. Heather Gordy
11 Von Ct
Fairfax, CA 94930-1024

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Mr. Lee Baldwin
11532 Liggett St
Norwalk, CA 90650-4715
(562) 864-0174

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Mr. Lee Baldwin

Mrs. victoria wallace
17822 Highway 94
Dulzura, CA 91917-1112

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Mrs. victoria wallace

Mr. Mr.& Mrs. Terry Cadwallader
11587 Joslyn Ct
Saint Louis, MO 63138-3555
(314) 355-4822

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Mr. Michael Stuart
11 Arlington St
Auburn, MA 01501-2637
(508) 864-4664

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Ms. Ruth-Ann Radcliff
17687 Oak View Ln
Penn Valley, CA 95946-9396

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Ms. Kathy Britt
5305 Via Santander
Yorba Linda, CA 92886-4570
(714) 970-6737

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4555 Thornton Ave
Apt 62
Fremont, CA 94536-5647

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Ms. Jennifer Head
1
Irvine, CA 92612

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Ms. Elizabeth Leaf
3255 Sacramento St Apt 4
San Francisco, CA 94115-2048

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Sincerely,
Ms. Elizabeth Leaf

Ms. Joy Burns
36770 Osawatomie Rd
Osawatomie, KS 66064-4142

Oct 11, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

Subject: Public Scoping Comments for the Environmental Impact Statement for the Walker Ridge Wind Project, Lake and Colusa Counties, CA

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Ms. Joy Burns

Ms. Sandy Liu
439 Deodar Ln
Bradbury, CA 91008-1016

Oct 11, 2010

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2550 North State Street
Ukiah, CA 95482

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Ms. Sandy Liu

Mrs. Kendra Knight
1657 Molitor Rd
Belmont, CA 94002-3715
699-3963

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2550 North State Street
Ukiah, CA 95482

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Ms. Josephine Louie
330 De Neve Dr
Los Angeles, CA 90024-8301

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2550 North State Street
Ukiah, CA 95482

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Ms. Nancy Treffry
19221 Pioneer Pl
Aromas, CA 95004-9732

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2550 North State Street
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Ms. Joan Leaf
4439 24th St
San Francisco, CA 94114-3521

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Mr. Mark Takaro
3026 Stanton St
Berkeley, CA 94702-2730

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Ms. E Graham
2825 Overland Ave
Los Angeles, CA 90064-4217

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Ms. Jena Rose
252 Coleman Dr
San Rafael, CA 94901-1209
(415) 482-9544

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Mrs. Marilyn Jasoni
509 Phillips Dr
Penngrove, CA 94951-8643

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Ms. Kathrin Kraft
6618 Tyrone Ave
Van Nuys, CA 91405-4739

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Mr. Bryan Pearl
2401 W Shady Glen Ave
Phoenix, AZ 85023-2135

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Sincerely,
Mr. Bryan Pearl

Ms. Lynn Flanagan
37 Jaipur Ln
Saratoga Springs, NY 12866-9278

Oct 12, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Ms. Kathrin Kraft
6618 Tyrone Ave
Van Nuys, CA 91405-4739

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Mr. John Infantino
44071/2 Avocado Street
Los Angeles, CA 90027

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Mr. John Infantino

Mr. Kenneth Tabachnick
PO Box 381
Woodland Hills, CA 91365-0381
(818) 340-2049

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2550 North State Street
Ukiah, CA 95482

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Mr. lee juskalian
PO Box 141
Cardiff, CA 92007-0141

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Mr. lee juskalian

Mr. Charles Binckley
304 Washington Ave
Richmond, CA 94801-3904

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PO Box 1613
Boyes Hot Springs, CA 95416-1613

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Ms. Corinne Greenberg
626 The Alameda
Berkeley, CA 94707-1602

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9 Mayfair Dr
San Francisco, CA 94118-2729

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Victorville, CA 92393-2099

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Ms. Melanie Mangels
1625 NE Club House Dr Apt 302
Kansas City, MO 64116-3110
(816) 474-3425

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Sincerely,
Ms. Melanie Mangels

Mr. Michael Barrows
1540 Linda Mar Blvd
Pacifica, CA 94044-4329
(650) 359-1728

Oct 13, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Mr. Michael Barrows

Mr. Richard Churray
PO Box 505
Port Haywood, VA 23138-0505
(804) 725-4031

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Ms. Vanessa Jenney
11 Monfort Pl
Syosset, NY 11791-2120

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Ms. Vanessa Jenney

Ms. Raylene Holt
147 Sunset Ave
Pleasant Gap, PA 16823-3526
(814) 359-3436

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Ms. Raylene Holt

Dr. Elisabeth Bacus
806 Eaglenest Ave
Akron, OH 44303-2408
(330) 836-2719

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Dr. Elisabeth Bacus

Ms. Denise Vandermeer
20511 Hatteras St
Woodland Hls, CA 91367-5312
(818) 999-0719

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18206 Smoke House Ct
Germantown, MD 20874-2427
(240) 686-1820

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Ms. Susan Habecker
702 S 4th St
Apt 4
Lebanon, PA 17042-6812

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Ms. Joyce Reier
117 Freedom Ct
Sidney, OH 45365-1527
(937) 492-9247

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Ms. Martha Lemke
46 Equestrian Way
Hawthorn Woods, IL 60047-7363
(847) 400-4822

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Ms. Martha Lemke

Mrs. Susanne Johnson
7510 Hellman Ave
Rancho Cucamonga, CA 91730-2201

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Ms. Karen Magruder
9086 Whirlaway Ct
Alta Loma, CA 91737-1418
(909) 987-7146

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Sincerely,
Ms. Karen Magruder

Ms. Kat Raisky
40 Newport Pkwy Apt 901
Jersey City, NJ 07310-1538

Oct 13, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Ms. Kat Raisky

Ms. Stacey Cannon
2770 Faith Rd
Salisbury, NC 28146-7363

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Ms. Hashi Hanta
PO Box 3110
Sells, AZ 85634-3110

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Ukiah, CA 95482

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Miss Christina Begley
3818 Laso Way
Orlando, FL 32822-7757

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Ukiah, CA 95482

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Ms. Rayanne Kirk
11763 Forest Grove St
El Monte, CA 91732-2223

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2550 North State Street
Ukiah, CA 95482

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Ms. Rayanne Kirk

Ms. Jamila Garrecht
620 E St
Petaluma, CA 94952-4157
(707) 781-0935

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Miss Rachel Hangley
1 Thompson St
Amesbury, MA 01913-2312
(978) 388-5073

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Ms. Karen Valentine
3675 Vienna Dr
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Mrs. Francine Arellano
535 Gianelli St
Tracy, CA 95376-4657

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Ms. Elaine Gorman
234 N Conejo Ave
Modesto, CA 95354-2939

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Ms. Diane Kastel
1303 Taft Ave
Wheaton, IL 60189-6782
(630) 456-4927

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Sincerely,
Ms. Diane Kastel

Ms. Lydia Silva
5701 Pioneer Blvd
Whittier, CA 90606-1047
(562) 463-9442

Oct 13, 2010

Rich Burns
2550 North State Street
Ukiah, CA 95482

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Ms. Jenna Ramsey
7260 Waite Dr
La Mesa, CA 91941-7631

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Ms. Frances Goff
5311 Corteen Pl Apt 32
Valley Village, CA 91607-2575
(818) 980-4235

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Mrs. Lisa Piner
1651 Iowa St
Costa Mesa, CA 92626-2066

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Mr. R. Banat
9927 Prairie Falcon Ct
Littleton, CO 80130-3819

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Ms. Cynthia Loucks
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Prescott, AZ 86303-3545

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23 W Galer St Apt 306
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Mr. Patrick Sennello
357 Ala Wai Blvd Apt 208
South Lake Tahoe, CA 96150-3389
(925) 544-1470

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