PUBLIC SCOPING SUMMARY REPORT
WALKER RIDGE WIND ENERGY PROJECT
ENVIRONMENTAL IMPACT STATEMENT

(CACA-51667)
LAKE AND COLUSA COUNTIES, CALIFORNIA

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Abbreviations and Acronyms

ACEC	Area of Critical Environmental Concern
AltaGas	AltaGas Renewable Energy Pacific, Inc.
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
DOI	Department of the Interior
EIS	Environmental Impact Statement (NEPA)
EPA	U. S. Environmental Protection Agency
FLPMA	Federal Land Policy and Management Act
IBEW	International Brotherhood of Electrical Workers
kV	Kilovolt
MBTA	Migratory Bird Treaty Act
MW	megawatt
NEPA	National Environmental Policy Act
NGO	Non-governmental Organization
NHPA	National Historic Preservation Act
NOI	Notice of Intent
OHV	Off-Highway Vehicle
ROW	Right-of-Way
RPS	Renewable Portfolio Standard
TMDL	Total Maximum Daily Load
USACE	U.S. Army Corps of Engineers
WTG	Wind Turbine Generator

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1.0 INTRODUCTION

AltaGas Renewable Energy Pacific, Inc., (AltaGas) has proposed to build, operate, and eventually decommission a wind energy generation facility that would produce up to 70 Megawatts (MW) of renewable energy using 42 wind turbine generators (WTGs). Alternative configurations were included under the initial right-of-way application. The Walker Ridge Wind Energy Generation Facility (hereinafter the project) would be located on about 500 acres within the Indian Valley Management Area, on lands administered by the U.S. Department of the Interior, Bureau of Land Management (BLM) at Walker Ridge, in the unincorporated areas of Lake and Colusa counties, California.

In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended and the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, the BLM is preparing an Environmental Impact Statement (EIS). AltaGas has requested that the BLM provide a right-of-way (ROW) grant for the project. The BLM, as the federal agency making the decision whether to grant the ROW, must complete the EIS is to identify potential effects that may occur from the construction, operation and maintenance, and decommissioning and restoration of the project.

The BLM has completed the public scoping phase of the project to help define the issues, impacts, and potential alternatives that will be analyzed in the EIS. Scoping is an early phase of the NEPA review process and is used to focus the environmental analysis and incorporate issues identified by the public into the analysis. This report summarizes the activities conducted during scoping, includes comments received during the scoping period, and indicates how the BLM will address specific comments in the EIS. The BLM will use the comments received during the scoping period to:

- Identify key issues to focus the analysis;
- Identify reasonable alternatives for analysis;
- Present environmental impacts of the project and alternatives;
- Identify ways to avoid or reduce environmental impacts;
- Inform the agency decision-making process; and
- Encourage public participation.

1.1 Purpose and Need

The BLM is responding to AltaGas' application for a ROW grant to construct, operate, maintain, and decommission a 60 to 70 MW wind energy generation facility on about 500 acres of land under the jurisdiction of the BLM within the unincorporated areas of Lake and Colusa counties, California, and after decommissioning, restore the land under Title V of the Federal Land Policy and Management Act of 1976 (43 U.S. Code 1761).

The need for the proposed action is to meet various federal mandates for increased development of renewable energy. Federal laws, mandates, and regulations pertaining to the development of renewable energy resources include:

- Sec. 211 of Energy Policy Act of 2005, enacted in August, 2005, which mandated up to 10,000 MW of non-hydropower renewable energy projects on the public lands by 2015.
- Secretarial Order 3283 Enhancing Renewable Energy Development on the Public Lands, signed January 16, 2009. The Order facilitates the Department of the Interior's (DOI's) efforts to achieve the goal Congress established in Section 211 of the Energy Policy Act of 2005 to approve non-hydropower renewable energy projects on public lands with a generation capacity of at least 10,000 MW of electricity by 2015. Based on these federal policies, the BLM is obligated to consider the proposal expeditiously to accommodate the potential increase in power generation that, if approved, would begin on or before 2013.
- Secretarial Order 3285 Renewable Energy Development by the DOI, signed March 11, 2009. The order establishes the development of renewable energy as a priority for the DOI and establishes a Departmental Task Force on Energy and Climate Change.

1.2 Description of the Project

AltaGas has applied for a BLM ROW authorization to construct, operate, maintain, and decommission a wind energy generation facility that would produce up to 70 MW of renewable energy. The project site is located on the border of Lake and Colusa counties in north central California (Figure 1). The Indian Valley Management Area is managed by the BLM's Ukiah Field Office. The project site is approximately 10 miles south of the Mendocino National Forest and directly east of Indian Valley Reservoir. The project would be constructed within the Indian Valley Management Area, entirely on BLM lands.

The wind energy generation facility would produce electrical power using up to 42 WTGs. Each WTG would be up to 428 feet tall, as measured from the ground to the turbine blade tip at its highest point, mounted on a reinforced concrete foundation. WTGs consist of three main above ground components: the turbine tower, the nacelle, and the rotor. The turbine tower supports and provides access to the nacelle, which is the enclosure that houses the turbine's main shaft, gearbox, generator, brakes, bearings, cooling systems, and other components. The turbine rotor is composed of three turbine blades which attach to the main shaft of the turbine via the hub.

Construction of the project, from mobilization to the site to final completion, is expected to occur during a single construction season, from the second quarter of 2012 to the fourth quarter of 2012.

1.3 NEPA Requirements

Scoping is the coordination and consultation process required under NEPA regulations to ensure that interested parties are allowed a forum to provide input on the issues to be analyzed in the environmental document. This process ensures that substantive issues and concerns, alternatives, and impacts are addressed in environmental documents, and determines the scope and degree to which these issues and impacts will be analyzed. Scoping is required by the Council on Environmental Quality 1979 regulations (40 Code of Federal Regulations [CFR] 1501.7). Public involvement early in the scoping process is the first step in providing a solid foundation for all project activities.

Legend

- Project Right-of-Way
- BLM Ukiah Field Office Jurisdiction

Data Sources: Bureau of Land Management, 2009
Ecology & Environment, Inc., 2010
ESRI, 2009 I ESRI,2008

Figure 1

Project Overview Map

Walker Ridge Wind Energy Project

Lake and Colusa Counties, California

1:1,250,000

0 2.5 5 10 15 20 25 Miles

The following interested parties were invited to participate in scoping:

- Federal agencies;
- State agencies;
- County agencies;
- City agencies;
- Affected tribes;
- Affected communities;
- Businesses;
- Interested non-governmental organizations; and
- Interested individuals.

One of the mechanisms to ensure that input from the parties listed above is included in the environmental document is for the lead agencies to hold scoping meetings early in the NEPA process. Although the scoping period is 30 days, it is not the only time in which interested parties can comment on the EIS. A similar process will begin as soon as the draft environmental document is released.

2.0 DESCRIPTION OF THE SCOPING PROCESS

The 30-day scoping period for the project was from August 13, 2010 to September 12, 2010. In response to public interest and request, BLM granted a 45-day extension to the scoping period, which ended on October 23, 2010. The scoping period commenced with publication of the Notice of Intent (NOI) in the *Federal Register* (Appendix A). The NOI announced a period for public scoping of alternatives, issues, impacts and planning criteria that would be used in the EIS. The NOI also requested the views of other agencies as to the scope and content of the environmental information that was germane to the statutory responsibilities or areas of expertise for those agencies. Federal, state, and local agencies as well as individuals or organizations that were interested or affected by the BLM's decision on this project were invited to participate in the scoping process and, if eligible, could request or be requested by the BLM to participate as a cooperating agency.

The BLM held three public scoping meetings near the project location. These meetings were held in Lakeport, California, on Thursday, September 9, 2010; Colusa, California on Friday, September 10, 2010; and Sacramento, California, on Friday, October 8, 2010. Press releases announced the meetings in advance (Appendix B). Additional outreach meetings were conducted by AltaGas and the BLM with local residents, conservation groups, businesses, Supervisor Mark Marshall of Colusa County, and Supervisor Denise Rushing of Lake County to discuss the project.

Each meeting began informally, with the attendees talking with and asking questions of BLM, AltaGas, and AltaGas' representatives. At the designated time or after new attendees were no longer arriving, the meeting began with an introduction by Rich Burns, Manager of BLM's Ukiah Field Office. Following introductory remarks by Mr. Burns, AltaGas' Peter Eaton provided a description of wind energy, the project, construction, and other details. Questions from attendees were taken throughout presentations by both Mr. Burns and Mr. Eaton. At the conclusion of the presentation, the public was again invited to ask questions. At the conclusion of public questions, attendees were invited to review project information sheets and posters, and to ask additional questions or engage in further discussion with BLM, AltaGas, and other project representatives. In addition to having the opportunity to provide verbal comments and ask questions at the scoping meeting, participants were also given the opportunity at the

meetings to provide written comments or to take a comment form to fill out and mail in at a later date. All meeting materials also contained a project-specific email address to facilitate collection of electronic comments. An example of these comment forms, as well as all other materials available to the public during the meetings, accompany this report (see Appendix C). Attendees of the meetings were encouraged to take additional comment forms with them.

The Lakeport, California meeting on September 9 began at 6:10 pm, was attended by 37 people, and the presentation concluded at 7:00 pm for questions and answers. Break-out sessions at informational posters began at 7:10 pm, and the last attendees left the meeting at 7:50 pm.

The Colusa, California meeting on September 10 began at 6:05 pm, was attended by 32 people, and the presentation concluded at 6:35 pm for questions and answers. Break-out sessions at informational posters began at 7:05 pm, and the last attendees left the meeting at 7:50 pm.

The Sacramento, California meeting on October 8 began at 12:18 pm, was attended by 24 people, and the presentation also included questions and answers. Break-out sessions at informational posters followed.

The BLM arranged tribal consultations with the Cortina Band of Wintun Indians, Elem Indian Colony, and Yocha Dehe, as the proposed project is within their traditional land holdings. The meeting included an overview of the project area, turbine layout, power interconnects, foundation size, etc, and followed up with a field tour of the proposed project.

Due to potential viewshed and visual impacts, letters were sent to the following tribes:

- Potter Valley Tribe
- Robinson Rancheria Pomo Indians
- Big Valley Band of Pomo Indians
- Lower Lake Rancheria Koi Nation
- Middletown Rancheria Band of Pomo Indians
- Scotts Valley Band of Pomo Indians
- Mishewal-Wappo Tribe of Alexander Valley
- Grindstone Indian Rancheria of Wintun-Wailaki Indians
- Paskenta Band of Nomlaki Indians

In addition to verbal comments received during these scoping meetings, the BLM received a total of 294 comment letters and/or emails, including 2 from government agencies, 16 from non-governmental organizations (NGOs), 3 from universities, and 273 from private citizens by the October 23, 2010 deadline; these comments are attached to this report (Appendix D).

The BLM also used the NEPA commenting process to satisfy the public involvement process for Section 106 of the National Historic Preservation Act (NHPA) (16 U.S. Code 470f) as provided for in 36 CFR 800.2(d)(3).

2.1 Other Scoping Activities and Information Repositories

Other scoping activities included:

- Posting the NOI on the BLM website.
- Briefing Lake and Colusa Counties.

- Contacting local, state and federal officials, including (For a complete list of representatives contacted, see Appendix F):
    - Mike Thompson, U.S. Congressman, First Congressional District of California (Federal)
    - Doug LaMalfa, Senator, California State Senate (State)
    - Brett Michelin, Chief of Staff, Office of Senator Sam Aanestad (State)
    - David Reade, Chief of Staff, Office of Assemblymember Jim Neilsen (State)
    - Manal Yamout, Special Advisor, Governor's Office for Renewable Energy Facilities (State)
    - Bill Stone, Director, Lake County Chamber of Commerce (Local)
    - Melissa Fulton, CEO, Lake County Chamber of Commerce (Local)
    - Bob Rider, President, Clear Lake Chamber of Commerce (Local)
    - Mark Marshall, Supervisor, Colusa County (Local)

- Publishing press releases on the California State Office and Ukiah Field Office BLM websites announcing the times and locations for each of the public scoping meetings. Press releases with information about scoping meetings were also published in the *Sacramento Bee*, *Lake County Record Bee*, *Clear Lake Observer*, *Woodland Daily Democrat*, *Lake County News Online*, *Davis Enterprise*, and the *Colusa Sun Herald*.
    - Sacramento Bee
    - Lake County Record Bee
    - Clear Lake Observer
    - Woodland Daily Democrat
    - Lake County News Online
    - Davis Enterprise
    - Colusa Sun Herald
- Initiating discussions with the United States Fish and Wildlife Service and the California Department of Fish and Game on survey protocols and data collection requirements.
- Initiating consultation with Native American tribes in the region.

3.0 COMMENT SUMMARY

3.1 Introduction

This section provides: (1) summaries of the methods used to organize and analyze comments; (2) summaries of issues identified during scoping; and (3) a list of issues that will not be identified in the EIS with justification as to why they will not be addressed.

Comments regarding the project and alternatives to the project will be considered by BLM in refining the project description and alternatives that will serve as the basis for assessing

impacts. The Council on Environmental Quality regulations implementing NEPA requires an analysis of available alternative actions prior to selecting the preferred action alternative. Input on alternatives will be considered in the analysis and text of the EIS. Chapter 2 of the EIS will describe which alternatives were considered but were not carried forward for detailed analysis in the EIS.

The Council on Environmental Quality regulations require an analysis of the impacts of a project on the "human environment." These impacts include effects on natural, human, and cultural resources. Discussions with affected public or agencies, such as those that have occurred through this scoping effort, help to define and evaluate effects of the different alternatives on the human environment. Comments relating to environmental impacts will be considered by BLM in developing the scope of EIS technical studies. Chapter 3, Affected Environment, and Chapter 4, Environmental Consequences, of the EIS will address the issues incorporated into the study. Concerns about the EIS studies and decision-making processes will be considered in refining and modifying the EIS process throughout the remainder of the EIS preparation.

Some comments may be considered outside the scope of this EIS if: (1) the issue relates to facilities not included in this project; (2) the issue is not within the jurisdiction of BLM to resolve; or (3) the issue cannot be reasonably addressed within the scope of this process or is being addressed through a separate NEPA process. Personal opinions in favor or opposing the project, wind power, and some other topics are considered outside the scope of the project EIS and will not be addressed

3.2 Organization of Comments

Comments from the scoping meetings, comment forms, e-mails and letters received through October 23, 2010 were reviewed, documented, and entered into a database to facilitate organization, sorting, and analytical review. The study team organized comments according to 21 major issue categories as they relate to the EIS. The issue categories are as follows and described in detail in Section 3.4.

The Project and Alternatives: This category includes comments about various aspects and components of the project as well as suggestions for project alternatives that should be considered in the EIS. Comments also identified topics relative to the planning and EIS preparation process, including public review opportunities. Identified issue categories are:

1. NEPA Process (including EIS preparation and studies)
2. Project Alternatives
3. Project Description
4. Purpose and Need
5. Regulatory Process/Public Involvement

Environmental Impacts: This category includes comments about the project's potential impacts on natural resources, human resources, and cultural resources as well as comments about social and economic concerns. The issue categories identified include the following:

1. Aesthetics/Visual Resources
2. Air Quality

3. Biological Resources
4. Climate Change
5. Cultural Resources
6. Cumulative Impacts
7. Environmental Justice
8. Geologic and Soil Resources
9. Growth Inducement
10. Hazards and Hazardous Materials
11. Hydrology, Water Quality and Water Resources
12. Land Use
13. Mitigation
14. Recreation
15. Social and Economic Considerations
16. Soils
17. Traffic and Transportation

3.3 Summary of Comments

All comments received during the scoping period are presented in Table 1, located at the end of this chapter. Comments presented in Table 1 have not been changed from their original format; therefore, the comments reflect the views of the commenters and may contain factual errors. Written comments received during the public scoping period are attached to this report (Appendix D).

The following governmental agencies provided comments:

- U.S. Environmental Protection Agency (EPA)
- Bureau of Land Management (BLM)

The following NGOs provided comments:

- International Brotherhood of Electrical Workers (IBEW), Local Union 340
- Sierra Club, Redwood Chapter
- Sierra Club, Yolano Group Motherlode Chapter
- California Rangeland Trust
- California Native Plant Society
- California Native Plant Society, Sanhedrin Chapter
- California Native Plant Society, Sacramento Valley Chapter
- Tuleyome

- Redbud Audubon Society, Inc.
- Californians for Western Wilderness
- The Wilderness Society
- California Wilderness Coalition
- Natural Resources Defense Council (NRDC)
- Center for Biological Diversity (CBD)
- Defenders of Wildlife

Members affiliated with the following organizations/groups submitted comments:

- International Brotherhood of Electrical Workers (IBEW), Local Union 340
- International Brotherhood of Electrical Workers (IBEW), Local Union 551
- International Union of Operating Engineers, Local 3
- Sonoma, Lake & Mendocino Counties Building and Construction Trades Council
- University of California, Davis
- California Native Plant Society
- The Wilderness Society

The following private companies submitted comments:

- Bear Valley Ranch, LLC
- Gabrielsen & Company
- Wilbur Hot Springs

The following company offered to provide services:

- OCAS, Inc.

The following organizations/groups were present at the City of Lakeport public scoping meeting but did not provide oral or written comments at the meeting:

- Redbud Audubon Society, Inc.
- City of Williams

The following organizations/groups were present at City of Sacramento public scoping meeting but did not provide oral or written comments at the meeting:

- University of California, Davis
- California Native Plant Society
- California Environmental Protection Agency (Cal/EPA)
- Colusa County

- Defenders of Wildlife
- Tuleyome
- Winzler & Kelly
- BLM

In addition, 11 individuals submitted 11 written comments. Of the written comments, 8 expressed support for the project.

3.4 Issues Identified During Scoping

This section provides a summary of issues identified during scoping organized by issue category. Some statements summarize multiple comments while others present only one comment. The method used to identify and categorize issues is discussed in Sections 3.2 and 3.3.

Aesthetics/Visual Resources

Commenters' concerns regarding visual resources focused on impacts to views from surrounding properties and nature preserves. Additionally, some commenters were concerned that nighttime aviation lighting would create light pollution and disrupt activities like stargazing in the valley where there are no other man-made sources of light.

One commenter suggested that steps be taken to minimize the visual impacts of the wind turbines.

Air Quality

Several comments expressed the need to include an evaluation of baseline ambient air quality conditions, as well as for an estimate of potential emissions from construction and maintenance activities, to be included in the Draft EIS. Commenters additionally requested a discussion of how emissions would be controlled over the life of the project to meet air quality standards.

One commenter requested emissions estimates by source in order to more effectively develop a mitigation strategy. Another commenter recommended that the Draft EIS include a Fugitive Dust Control Plan. Concern was expressed about the air quality/public health impacts from burning vegetation.

A comment was also submitted addressing monitoring and mitigation of airborne naturally occurring asbestos as a result of soil disturbance during construction. See the Geologic Resources section for a more detailed explanation.

Biological Resources

A large number of commenters expressed concern that the project site is located along a principal migratory route and therefore will potentially cause significant impacts to the flight patterns of birds and bats. Commenters noted the disruption of flight patterns and the risk of wind turbines killing birds and bats. Several commenters specifically expressed concern for protected species such as the bald eagle and golden eagle.

Two comments expressed concern about the impacts of night lighting and noise on birds and bats.

Comments questioned the adequacy of one year of botanical and wildlife surveys. The commenters stressed that the project was proposed to be built on land hosting unique plant and wildlife habitats, and therefore the need for more extensive surveys that better met protocol.

Eight comments specifically addressed the spread of invasive plant species on the proposed project site, and requested an in-depth mitigation and monitoring plan to be included in the Draft EIS to control the spread of such species on Walker Ridge.

Comments were submitted addressing the presence and sensitivity of rare plant species on the project site.

Several commenters requested that the Draft EIS take into consideration the role of Walker Ridge as a habitat connectivity corridor, and how the proposed project would impact the quality of the habitat for present species.

Many comments were received addressing the impacts to a variety of species including rare butterflies, dragonflies, damselflies, and other wildlife species that inhabit the proposed project area.

Climate Change

Two comments were submitted regarding climate change. One suggested including a discussion in the Draft EIS about how climate change could potentially intensify the project's impacts, and the other requested a discussion of the potential for the proposed project to positively effect climate change.

Cultural Resources

Three comments were submitted concerning cultural resources, all of which were in regards to the existence of Indian sacred sites and how these, as well as consultations with local tribes, would be addressed in the Draft EIS.

Cumulative Impacts

Commenters were concerned about cumulative impacts of the proposed project, in the context of other large-scale wind and solar projects, on each resource that could be affected. Additionally, criteria for evaluation of cumulative impacts of the proposed project and its alternatives were suggested, including assessing the current conditions of resources and identifying opportunities to minimize and mitigate cumulative impacts.

One comment specifically addressed the cumulative impacts of the interconnecting transmission line, along with the transmission needs of other reasonably foreseeable projects.

Environmental Justice

One comment was submitted suggesting an evaluation of impacts from the proposed project on minority and low-income populations in the project region, and for outreach with such populations to be addressed in the Draft EIS.

Geologic Resources

Several comments addressed the need for excavated soil to be stabilized or properly disposed of to prevent long-term sedimentation. The comments expressed concern that excavation could release mercury and chromium that are present in the soil, and cause further contamination to surrounding water resources, such as the Sacramento River. One comment urged the completion of toxic substance studies prior to any project approvals or construction. The same commenter suggested that the studies be undertaken by the U.S. Geological Survey in order to assure impartiality.

Comments expressed concern about the stability of the soil on Walker Ridge, noting a landslide hazard below the Indian Valley Reservoir and calling for assessment of other hazard areas.

One comment was submitted including recommendations for treatment of serpentine soil, for example during revegetation, in order to maintain soil health and balance.

Comments noted that serpentine soil is especially susceptible to erosion, which could be exacerbated by illegal OHV use resulting from construction of new access roads associated with the proposed project.

A number of comments were received regarding the presence of mercury, chromium and asbestos in the serpentine soil on Walker Ridge. Commenters were concerned that disruption of the soil could release these chemicals into the air and water and create an environmental and public health risk. Concern was also expressed that further contamination would offset past effort and investment to treat the area for mercury and chromium contamination from abandoned mine sites.

Growth Inducement

One commenter expressed concern that Draft EIS should describe the reasonably foreseeable future land use and associated impacts that will result from the additional power supply. The document should also address the amount of growth, its likely location, and the biological and environmental resources at risk.

Hazards and Hazardous Materials

One comment addressed the need for an assessment in the Draft EIS of direct and indirect impacts of hazardous waste from construction, as well as storage, management, and disposal plans.

Some comments suggested hazardous contamination mitigation measures, including the use of alternative materials and industrial processes, and considering the full project lifecycle, from sourcing the turbine materials to future recycling.

Several comments expressed concern about naturally-occurring hazardous materials, including mercury, chromium and asbestos, that are found in the soil in the project area; and synthetic chemicals, such as pesticides and herbicides, used during project construction and maintenance. Concerns were focused mainly on how potential public health hazards and contamination of water resources from these materials will be prevented or minimized.

A number of comments were received addressing the risk of fire in the project area due to the chaparral habitat. Comments expressed concern that construction activities, increased access to the land, and wind turbine operation could exacerbate fire risks.

One comment expressed concern that the fire breaks included in the Plan of Development to mitigate the fire risk created new environmental impacts.

Hydrology, Water Quality and Water Resources

Commenters expressed concern about the potential for contamination of nearby water resources during construction of the proposed project. Some comments requested that the Draft EIS identify source water protection sites and potential contaminants in the project area, as well as measures taken to protect water quality.

One comment requested an estimate of the quantity of water and its source used for the on-site concrete batch plant.

Several comments expressed concern that mercury, chromium and asbestos occurring in the soil on Walker Ridge would be released during grading, and would contaminate the surrounding water resources, creating a public health concern.

Several comments suggested a consultation with the U.S. Army Corps of Engineers to determine the need for Section 404 permits under the Clean Water Act. As part of this measure, commenters encouraged surveys to be conducted to create delineations of wetlands and ephemeral drainages, and to identify all water resources in the project area. Commenters expressed the need for a Total Maximum Daily Load Plan to be developed for the Indian Valley Reservoir, and for certification by the Central Valley Regional Water Board for any development activity.

Some comments expressed concern about the negative impact of stormwater runoff on watersheds during construction. One comment suggested measures for revegetation efforts to control erosion and prevent watershed contamination.

One commenter requested that wetlands, seeps and springs be identified, and potential impacts to them assessed in the Draft EIS.

Land Use

One commenter requested an analysis of how the proposed project would support or conflict with federal, state, local, and tribal land use plans and policies in the project area.

A number of comments were received urging the adoption of a conservation easement or other conservation designation in order to recognize the ecological value of Walker Ridge, and to protect it and the surrounding natural area against development. Suggested designations included Citizen Proposed Wilderness Area, Federal Wilderness designation, part of a proposed Berryessa Snow Mountain National Conservation Area, and Area of Critical Environmental Concern (ACEC). One comment urged BLM to adopt an Activity Management Plan for the proposed Walker Ridge ACEC in order to better evaluate potential impacts of the proposed project. Another comment suggested the area was in consideration as a National Monument.

One commenter opposed the development of any private venture on public land.

A number of comments inquired about the progress of BLM's ACEC activity plan for protecting the resources of Walker Ridge

Mitigation

One comment was received suggesting adoption of an adaptive management plan to evaluate and monitor impacted resources, and to ensure the successful implementation of mitigation measures.

NEPA Process

One comment was received expressing concern that beginning the NEPA process before all surveys are completed would incline the project toward approval without all the necessary information to make an informed decision.

One comment addressed the schedule of the NEPA process with regards to the proposed project.

Noise

Comments received focused on the impacts of noise and sound pollution from wind turbines in a generally quiet area, and requested an assessment of decibel levels to be included in the Draft EIS. Several commenters specifically expressed concern about neurological and other effects of noise and sub-frequencies produced by wind turbines on wildlife, birds, bats and humans.

One commenter was concerned about the impacts of noise from the turbines on the market value of his home.

Project Alternatives

A number of comments were received requesting clarification on the process of identifying and evaluating reasonable alternatives to the proposed project. Some comments suggested additional project alternatives, including a No Action alternative, and consideration of alternative locations. Several comments requested a clear comparison of the impacts of the full range of alternatives to be included in the Draft EIS.

One comment requested a clarification of significance criteria used to assess the impacts of the alternatives.

Project Description

Two comments suggested that the Project Description discuss bonding as a strategy for decommissioning and reclamation.

One commenter stated that the Project Description in the Plan of Development was inadequate to fully assess environmental impacts. Another commenter stated that in order to accurately assess the impacts, the Project Description must include the whole 14,000 acres of Walker Ridge.

One commenter wanted to know the boundaries of the proposed project and how they might effect his adjacent property.

Purpose and Need

One comment urged the need to include a clear purpose and need statement in the Draft EIS. Another comment requested that the project's purpose and need be evaluated in the context of the larger energy market and the State's energy goals.

One commenter wrote that the BLM's stated need should not supersede its commitment to environmental quality.

Recreation

Several comments suggested that the proposed project would result in a loss of recreational opportunities, and that mitigation include avoidance of areas used for recreation. One comment noted the location of Walker Ridge in relation to a number of other recreational wilderness areas, and the impact the project could have on recreation activities in the surrounding region.

One comment requested a discussion in the Draft EIS of the economic impact on the local communities from a decrease in tourism resulting from construction of the proposed project.

Regulatory Process/Public Involvement

A number of comments requested an extension of the public scoping period.

Several commenters expressed the need for access to AltaGas's proprietary wind data in order for the public to make an informed decision about the project. One comment requested intensive, multi-year, transparent ecological studies to be undertaken prior to any construction activities.

One comment addressed the applicability of FWS permit regulations and their relation to the proposed project.

Several comments received addressed the effectiveness of BLM's communication with the public, and the need to better engage the public.

Social and Economic Considerations

Several comments were submitted inquiring into the economic feasibility of the proposed project, based on estimated investment and wind resource potential of the proposed project area. Commenters expressed concern that the project would only be viable with significant public subsidies.

Comments were submitted by neighbors of Walker Ridge concerned about the impact of the proposed project on lands adjacent to the proposed project site. Concerns included potential adverse effects on adjacent privately-owned nature reserve, and that negative impacts to surrounding property values. In addition, runoff of chemicals occurring in the soil on Walker Ridge, and herbicides used during construction, could impact the quality of the adjacent lands, and thereby impact the businesses linked to the land. Those comments generally requested compensation for potential impacts.

Commenters also expressed concern that construction of the proposed project would increase access to surrounding public lands by illegal poaching and drug-growing operations.

Some comments were submitted in support of the project, citing the project's potential to stimulate the economy and create jobs. Two comments also recognized the contribution of the project toward reaching State-mandated energy goals.

Soils

One commenter requested that soil resource issues be addressed early in the process through preparation of detailed drainage, erosion, sediment control plans in order to identify potential impacts and develop mitigation measures that would reduce impacts to a level of less than significant.

Transportation and Traffic

One comment was submitted in relation to traffic and transportation impacts. The commenter noted that impacts would vary depending on the source of the base rock to be used for construction of the access road, and therefore on which direction the traffic is moving.

3.5 Issues Outside the Scope of the EIS

Some commenters requested that the BLM add them to the mailing list. Some comments recommended involvement of certain people, groups and institutions to be involved in the biological surveys or as independent reviewers. Each of these requests has been satisfied.

Table 1 Summary of all Comments Received (by topic)

Resource/Issue	Comment	Commenter
AESTHETICS/VISUAL RESOURCES		
Visual Resources 64000	AE1: 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.	EPA, 09/13/10
	AE2: 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.	Ryan O'Dell, affiliation unknown 10/08/10
	AE3: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10
	AE4: 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.	Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
	AE5: 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.	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10
	AE6: 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.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10
	AE7: I believe that this long linear row of wind machines 500-ft. high, will be aesthetically ruinous	L. Martin Griffin, Jr.,

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	for Bear Valley, and kill thousands of birds, including raptors and songbirds, since this is a migratory pathway.	date unknown
	AE8: 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.	L. Martin Griffin, Jr., date unknown
Visual Impact Analysis 64500	AE9: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
Nighttime Lighting	AE10: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
	AE11: 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.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10

Table 1 Summary of all Comments Received (by topic)

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	AE12: Will the warning lights atop the wind machines disorient migratory birds, which often fly long distances at night?	L. Martin Griffin, Jr., date unknown
Visual Impact Mitigation	AE13: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
AIR QUALITY		
Dust Generation/ Dust Control	AQ1: Fugitive Dust Control Plan—The Draft EIS (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 mph. Limit speed of earth-moving equipment to 10 mph.	EPA, 09/13/10
General Air Quality 40000	AQ2: The DEIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, 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.	EPA, 09/13/10
	AQ3: 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, 09/13/10
	AQ4: 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.	EPA, 09/13/10
	AQ5: 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.	EPA, 09/13/10
	AQ6: Specify Emission Sources – The DEIS should specify the emission sources by pollutant from	EPA, 09/13/10

Table 1 Summary of all Comments Received (by topic)

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	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.	
	AQ7: Equipment Emission Mitigation Plan – 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.	EPA, 09/13/10
	AQ8: The DEIS should contain an analysis of emissions from onsite concrete production, including estimated mitigated annual emissions.	EPA, 09/13/10
Air Monitoring Plan 40700	AQ9: 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	Ryan O'Dell, unknown 10/08/10

Table 1 Summary of all Comments Received (by topic)

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	should also be paved.	
Air Sampling	AQ10: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
Smoke	AQ11: 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.	EPA, 09/13/10
BIOLOGIAL RESOURCES		
Avian Impacts 30200	BIO1: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, Santa Rosa, 8/18/2010
	BIO2: 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 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, Santa Rosa, 8/18/2010
	BIO3: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	BIO4: 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	Tom Meagher, BLM Sacramento, 10/08/10

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	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	

Table 1 Summary of all Comments Received (by topic)

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	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. http://en.wikipedia.org/w/index.php?title=Environmental_effects_of_wind_power&action=edit&section=8 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]	

Table 1 Summary of all Comments Received (by topic)

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	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]	
	BIO5: Identify specific measures to reduce impacts to eagles and clarify how the proposed project will comply with MBTA and BGEPA.	EPA, 09/13/10
	BIO6: The DEIS 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 migration populations of less abundant species which may be sensitive to increased mortality as a result of collision.	EPA, 09/13/10
	BIO7: 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 the 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.	EPA, 09/13/10
	BIO8: 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.	EPA, 09/13/10
	BIO9: If alternatives cannot be developed that avoid take of eagles, develop an operational monitoring and adaptive management plan to address the issue.	EPA, 09/13/10
	BIO10: Wind energy development is inappropriate at this site for the following reasons: • 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.	Samantha Pfeifer, Woodland, CA, 10/04/10; Roberta Millstein, Davis, CA, 10/06/10; Misha Popov, affiliation unknown,

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		10/01/10; Christopher Lish, Olema, CA, 10/13/10; The Wilderness Society et al, 10/07/10
	BIO11: There is evidence that this area may be critical for migrating birds who could be harmed by wind turbine blades.	Dana Stokes, Davis, CA, 10/07/10
	BIO12: There are the hazards to local birds.	Caleb Huynh, Clearlake Oaks, CA, 10/09/10
	BIO13: The danger to flying animals presented by wind turbines is well documented.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10
	BIO14: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	BIO15: 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.*	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	BIO16: The large turbines…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	Ellen Karnowski, affiliation unknown, 10/18/10

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	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.	
	BIO17: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	BIO18: 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?	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	BIO19: The following questions must be fully addressed in the EIS: 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?	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	BIO20: 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 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 can be developed to significantly reduce take, the operator	EPA, 09/13/10

Table 1 Summary of all Comments Received (by topic)

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	of a wind-power facility may qualify for a programmatic take permit. Most permits under the new regulations would authorize disturbance, rather than take.	
	BIO21: 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.	Hazel J. Gordon, Davis, CA, 10/04/10
	BIO22: 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.	Sunny Franson, unknown, 10/04/10
	BIO23: There has been considerable bird collision 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 Atlamont Pass Wind Resource Area were roughly 9.000 to 15,000 bird kills per year (Smallwood and Karas, 2009). The Tehachapi Pass WPA 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	BIO24: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	BIO25: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10

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	BIO26: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	BIO27: 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 Wilderness Society et al, 10/07/10
	BIO28: 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 habitats 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 arm but others along the West Coast) for each species? How will that mortality affected 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:	Roberta Lyons, Conservation Chair, Redbud Audubon Society, Inc., 10/12/10

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	• There should be night monitoring for the 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.	
	BIO29: 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.	Ryan O'Dell, unknown 10/08/10
	BIO30: 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	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10

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	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.	
	BIO31: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
	BIO32: 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.	Ellen Dean, Curator, UC Davis Center for Plant Diversity, 10/08/10
	BIO33: Wind energy development is inappropriate at this site for the following reasons: • 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.	Samantha Pfeifer, Woodland, CA, 10/04/10; Roberta Millstein, Davis, CA, 10/06/10; Misha Popov, affiliation unknown, 10/01/10; Christopher Lish, Olema, CA, 10/13/10
	BIO34: 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.	L. Martin Griffin, Jr., date unknown
	BIO35: 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,	Alice Bond, The Wildnerness Society;

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	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), Yello, 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).	Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
	BIO36: 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.	Leslie Friedman, San Francisco, CA, 10/07/10
Impacts of Lighting on Birds and Bats 30130	BIO37: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
Wildlife Impacts 30212	BIO38: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
	BIO39: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10

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	BIO40: 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 and 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
Habitat Impacts 30214	BIO41: 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.	EPA, 09/13/10
	BIO42: 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.	Samantha Pfeifer, Woodland, CA, 10/04/10; Roberta Millstein, Davis, CA, 10/06/10; Misha Popov, affiliation unknown, 10/01/10; Christopher Lish, Olema, CA, 10/13/10; The Wilderness Society et al, 10/07/10
	BIO43: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, Santa Rosa, 8/18/2010

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	BIO44: 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.	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10
	BIO45: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	BIO46: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	BIO47: 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 birs migratory route of global importance.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	BIO48: The Walker Ridge 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
Impacts on Butterflies and other species	BIO49: 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	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10

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	review and comment.	
	BIO50: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	BIO51: Wind energy development is inappropriate at this site for the following reasons: • 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.	Samantha Pfeifer, Woodland, CA, 10/04/10; Roberta Millstein, Davis, CA, 10/06/10; Misha Popov, affiliation unknown, 10/01/10; Dana Stokes, Davis, CA, 10/07/10; Christopher Lish, Olema, CA, 10/13/10; Wilderness Society et al, 10/07/10
	BIO52: 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
	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	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders

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	America, and again a disjunct population of a Southern California species.	of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
Special Status Species Surveys 30110	BIO53: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	BIO54: 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	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
Special-Status Species and Habitats 30117/30118	BIO55: 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 Diversity Database, yet disclosure of potential impacts is nevertheless required. A list of these types is available from the California Department of Fish & Game.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
	BIO56: 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	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS

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	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*	10/11/10
	BIO57: 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 with both NEPA and CEQA.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
	BIO58: Walker Ridge hosts up to 23 special-status, serpentine-associated plant species, more than 50 serpentine endemic plants, and many unusual plant communities.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
Wildlife Surveys 30210	BIO59: 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.	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10

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	"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.	
	BIO60: 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.	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10
	BIO61: 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	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10

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	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."	
Plant Impacts 30100	BIO62: 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. Chlorogalum 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, 10/08/10
	BIO63: [Walker Ridge's] importance as a refuge for plants whose other habitats had been eradicated by development has been recognized for decades.	Katherine F. Mawdsley, Davis, CA, 10/13/10
	BIO64: Walker Ridge is a sensitive natural area. A substantial component of the plant diversity of	Geri Hulse-Stephens,

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	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.	President, California Native Plant Society Sanhedrin Chapter, 09/09/10
Botanical Surveys 30110	BIO65: The DEIS should include general locations of rare plants, and how these sites will be managed to minimize impacts on the plants.	EPA, 09/13/10
	BIO66: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	BIO67: "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.	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10
	BIO68: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	BIO69: 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-	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10

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	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.	
	BIO70: 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*	Greg Suba, Conservation Program Director, California Native Plant Society, 10/23/10

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	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)	
	BIO71: 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) ecompassing the entire Walker Ridge area. 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
Biological Surveys 30000	BIO73: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	BIO74: 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	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09

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	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.	
Invasive Species 30113	BIO75: If the proposed project will entail new landscaping, the DEIS should describe how the project will meet the requirements of Executive Order 13112.	EPA, 09/13/10
	BIO76: The DEIS should include an invasive plant management plan to monitor and control noxious weeds.	EPA, 09/13/10
	BIO77: 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.	Ryan O'Dell, unknown 10/08/10
	BIO78: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	BIO79: 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).	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	BIO80: 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.	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10

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	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.	
	BIO81: 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.	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10
Invasive Species Mitigation 30140	BIO82: 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? 9) 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	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10

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	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).	
Noxious Weed Control 30114	BIO83: 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
Vegetation Removal	BIO84: 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 the 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
CLIMATE CHANGE		
Climate Change Impacts	CC1: 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.	EPA, 09/13/10
Climate Change Benefits	CC2: The DEIS should quantify and disclose the anticipated climate change benefits of solar 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.	EPA, 09/13/10

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CULTURAL RESOURCES		
Tribal Consultations/Coordination Potential Indian sacred sites in project areas 60020	CR1: The DEIS should describe the process and outcome of government-to-government consultation between the 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.	EPA, 09/13/10
	CR2: 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 the 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 State Historic Preservation Officer/Tribal Historic Preservation Officer, including identification of National Register of Historic Places eligible sites, and development of a Cultural Resource Management Plan.	EPA, 09/13/10
Presence of Archaeological and Cultural Sites in the Region 60010	CR3: The region is rich in archeological and cultural sites of particular importance to tribes in the region.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09
CUMULATIVE IMPACTS		
General	CI1: 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
	CI2: 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.	EPA, 09/13/10

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	CI3: 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 Forth 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.	EPA, 09/13/10
Transmission Interconnection	CI4: 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.	EPA, 09/13/10
ENVIRONMENTAL JUSTICE		
Environmental Justice Populations 61100	EJ1: 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.	EPA, 09/13/10

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GEOLOGIC AND SOIL RESOURCES		
Excavation and Sedimentation 42200	GEO1: 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.	Tom Meagher, BLM Sacramento, 10/08/10
	GEO2: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	GEO3: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 1/2/10
Geologic and Soil Stability 42200	GEO4: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	GEO5: 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	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome,

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	studies to assess this potential hazard.	12/22/09
Mercury, Chromium and Asbestos in Serpentine Rocks and Soils 42100	GEO6: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10; Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
	GEO7: The Canadian developer Alta Gas has proposed an industrial wind development project on	Bob Schneider, Senior

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	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.	Policy Director, and Andrew Fulks, President, Tuleyome, 1/2/10
	GEO8: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 1/2/10
	GEO9: Mercury and chromium mine tailings in the area should be considered a hazard.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 1/2/10
	GEO10: 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.**	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 1/2/10
	GEO11: Asbestiform minerals are often associated with serpentinite. These minerals can be mobilized through road building and other activities that disturb serpentine soils.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 1/2/10
	GEO12: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010
	GEO13: 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 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	EPA, 09/13/10

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	roads.	
	GEO14: EPA 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.goc/loader.cfm?url=/commonspot/security/getfile.cfm&pageid=33546.	EPA, 09/13/10
	GEO15: 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.	Ryan O'Dell, unknown 10/08/10
Serpentine Soil 42100	GEO16: 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.	Ryan O'Dell, unknown 10/08/10
Erosion 42300	GEO17: Serpentine soils are highly susceptible to erosion and are challenging to revegetate once disturbed.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 1/2/10
	GEO18: 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.	Ryan O'Dell, unknown 10/08/10
Soil Disturbance 42200	GEO19: 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.	Katherine F. Mawdsley, Davis, CA, 10/13/10
	GEO20: 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 disturbed 500 acres, only 100 of which is sensitive soil impacts. 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	Gordon J. Harrington, affiliated with UC Davis Herbarium, 9/10/10

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	natural ecosystem existing prior to disturbance. So my primary concern ins how to minimize the waste disturbed lands.	
Survey of Toxic Substances in Soil 42100	GEO21: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010
	GEO22: While not a primary focus in the meeting we also discussed the need understood need to analyze for asbestos minerals.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010
	GEO23: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010
USGS 42100	GEO24: **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.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010
Rock and Soil Characterization 42100	GEO25: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 1/2/10

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Serpentinite Geology 42100	GEO26: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010
GROWTH INDUCEMENT		
General	GI1: 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.	EPA, 09/13/10
HAZARDS AND HAZARDOUS MATERIALS		
Impacts of Hazardous Waste from Construction/Operation	HAZ1: 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.	EPA, 09/13/10
Hazardous Waste Impact Mitigation	HAZ2: 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.	EPA, 09/13/10
Naturally Occurring Asbestos	HAZ3: 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.	EPA, 09/13/10
Address full product life cycle of project	HAZ4: 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.	EPA, 09/13/10
Pesticides and Herbicides	HAZ5: 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 chemicals, and describe what actions will be taken to assure that impacts by toxic substances released to the environment will be minimized.	EPA, 09/13/10

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Fire Hazard 67000	HAZ6: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, Santa Rosa, 8/18/2010
	HAZ7: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	HAZ8: The area has high fire potential in the chaparral plant community.	Dana Stokes, Davis, CA, 10/07/10
	HAZ9: 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.	Caleb Huynh, Clearlake Oaks, CA, 10/09/10
	HAZ10: 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.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10
	HAZ11: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10

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	HAZ12: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010
HYDROLOGY, WATER QUALITY AND WATER RESOURCES		
Water Resources/Water Sources/Water Quality 43000	HWR1: 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.	EPA, 9/13/10
	HWR2: The 1996 amendments to the Safe Drinking Water Act require federal agencies to protect source 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.	EPA, 9/13/10
	HWR3: Mercury and chromium are known to be present in this region, which contains a number of abandoned mines were 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, Santa Rosa, 8/18/2010
	HWR4: 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.	Hazel J. Gordon, Davis, CA, 10/04/10
	HWR5: 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	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10

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	defined in the EIS for public review and comment.	
	HWR6: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	HWR7: Wind energy development is inappropriate at this site for the following reasons: • 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.	Samantha Pfeifer, Woodland, CA, 10/04/10; Roberta Millstein, Davis, CA, 10/06/10; Misha Popov, affiliation unknown, 10/01/10; Dana Stokes, Davis, CA, 10/07/10; Christopher Lish, Olema, CA, 10/13/10; The Wilderness Society et al, 10/07/10
	HWR8: 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.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10
Clean Water Act 20700	HWR9: The project applicant should coordinate with the U.S. Army Corps of Engineers (USACE) 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 the BLM include a	EPA, 9/13/10

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	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 USACE 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.	
	HWR10: 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 Clean Water Act ("404(b)(1)Guidelines"). Pursuant to 40 CFR 230, any permitted discharge into WOUS must be the least environmentally damaging practicable alternative 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.	EPA, 9/13/10
	HWR11: The DEIS should provide information on Clean Water Act Section 303(d) impaired waters in the project area, if any, and efforts to develop and revise TMDLs.	EPA, 9/13/10
	HWR12: 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
Site Drainage	HWR13: 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.	EPA, 9/13/10
	HAZ14: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and

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		Catherine Townzen, affiliation unknown, 10/11/10
Mitigation and Restoration of Water Resources 43500	HWR15: 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.	EPA, 9/13/10
Watershed Impacts 43500	HWR16: In addition, we are extremely concerned about the potential from 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
Erosion and Sedimentation Impacts 43150	HWR17: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
Wetlands 43100	HWR18: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10

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LAND USE		
Consistency with Proposed and adopted land use plans 66000	LU1: 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 control 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).	EPA, 9/13/10
	LU2: 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 protect status of the Bear Valley Ranch and the high potential for a landscape-level preserve in assessing the true impact of the wind project.	Nita Vail, CEO, California Rangeland Trust, 10/13/10
	LU3: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	LU 4: 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."	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10
	LU5: The value of Walker Ridge and the need for comprehensive inventories and conservation	Craig Thomsen,

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	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).	Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10
	LU6: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09
	LU7: 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.	Michael J. Painter, Coordinator, Californians for Western Wilderness, 10/13/10
	LU8: Wind energy development is inappropriate at this site for the following reasons: • 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.	Misha Popov, affiliation unknown, 10/01/10; Dana Stokes, Davis, CA, 10/07/10; Christopher Lish, Olema, CA, 10/13/10; Wilderness Society et al, 10/07/10
	LU9: 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, 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:	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan

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	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."	Henson, California Wilderness Coalition, 08/17/10
ACEC Designation 66100	LU10: 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.	Hazel J. Gordon, Davis, CA, 10/04/10
	LU11: 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.	Greg Suba, Conservation Program Director, California Native Plant Society, 10/23/10

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	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.	
	LU12: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	LU13: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09
	LU14: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	LU15: 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	Dana Stokes, Davis, CA, 10/07/10
	LU16: 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 ACEC; this proposal is full of information on the botanical values and uniqueness of Walker Ridge. Whether through this specific proposal or by	Dr. Susan Harrison, affiliated with UC Davis, 9/14/10

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	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. Please protect this area and do not proceed with the proposed project. 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.	
	LU17: 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?	Geri Hulse-Stephens, President, California Native Plant Society Sanhedrin Chapter, 09/09/10

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	LU18: 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 violation of the public trust.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
Wilderness Characteristics 66400	LU19: Wind energy development is inappropriate at this site for the following reasons: • The Walker Ridge area contains lands with wilderness characteristics; therefore, potential wilderness areas must be assessed prior to any irrevocable commitments.	Misha Popov, affiliation unknown, 10/01/10/ Dana Stokes, Davis, CA, 10/07/10; Christopher Lish, Olema, CA, 10/13/10; Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10; Wilderness Society et al, 10/07/10
Opposition to Use of Public Land	LU20: 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.	Ronald Oertel and Somkiat Ashton, Woodland, CA, 10/11/10

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MITIGATION		
Adaptive Management Techniques	M1: 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 CEQ on Modernizing NEPA.	EPA, 9/13/10
Insufficient mitigation	M2: 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
	M3: In general, the avoidance and mitigation measure 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
NEPA PROCESS		
NEPA Process 10100	NP1: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010
Schedule 10300	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?	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10

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NOISE		
Noise Measurement and Impact Assessment 41100	N1: 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.	EPA, 9/13/10
Sound Pollution 41400	N2: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
Neurological Effects	N3: There are the noises, sub-frequencies and otherwise, that the numerous giant turbines will emit that may or may not affect living things neurologically.	Caleb Huynh, Clearlake Oaks, CA, 10/09/10
	N4: 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.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10
Impacts of Noise on Birds and Bats 41700	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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
General Noise 41000	N5: The large turbines also are noisy	Ellen Karnowski, affiliation unknown, 10/18/10
	N6: Couldn't this be done with much quieter solar panels?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10

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	N7: Noise travels all too well in the open dry air that surrounds us at Double Eagle Ranch.	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
Infrasound	N8: 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?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
	N9: Will the sound evaluation focus entirely on decibels, or will it also consider what many people consider more important; infrasound vibrations?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
Noise mitigation	N10: 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?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
PROJECT ALTERNATIVES		
Comparative Analysis 22700	ALT1: 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, high).	EPA, 9/13/10
	ALT2: 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 impacts, tons per year of emissions produced, etc.)	EPA, 9/13/10
	ALT3: The DEIS should describe how each alternative was developed, how it addresses each project objective, and how it will 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.	EPA, 9/13/10
	ALT4: 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	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10

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	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.	
Significance Criteria	ALT5: 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).	EPA, 9/13/10
Range of Alternatives 22500	ALT6: 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.	Samantha Pfeifer, Woodland, CA, 10/04/10; Roberta Millstein, Davis, CA, 10/06/10; Dana Stokes, Davis, CA, 10/07/10
	ALT7: All alternatives should be considered in the EIS including: No Action; alternative locations including 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	ALT8: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
	ALT9: 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	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10

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	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.	
	ALT10: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	ALT11: 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-ornone" project, and the potential for reducing impacts by reducing the extent of the development must be included in the BLM's	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09

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	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	
	ALT12: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09
	ALT13: 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
Alternative Project Locations 22500	ALT14: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	ALT15: Could this be located further away from us?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
	ALT16: 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
	ALT17: 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.	Leslie Friedman, San Francisco, CA, 10/07/10

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"No Action" Alternative 22520	ALT18: We strongly urge you to make the "No Action" Alternative your preferred alternative when you complete your Draft Environmental Impact Statement.	Michael J. Painter, Coordinator, Californians for Western Wilderness, 10/13/10
PROJECT DESCRIPTION		
Decommissioning	PD1: EPA recommends that the DEIS identify bonding or financial assurance strategies for decommissioning and reclamation.	EPA, 9/13/10
	PD2: Bonding: The project description needs to discuss in much more detail bonding for full decommissioning.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
Reclamation Plan	PD3: 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
General	PD4: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
Project Area	PD5: The project area must include the entire 14,000 acres of the Walker Ridge Unit.	Bob Schneider, Senior Policy Director, and Andrew Fulks,

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		President, Tuleyome, 10/23/10
	PD6: 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?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
	PD7: 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?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
	We own two 80 acre parcels that look to be next to Proposed 51. How will the turbine effect our parcels? How far will they be built from the parcel boundary?	Thomas Holcomb, Sacramento, CA, 10/08/10
PURPOSE AND NEED		
General 20200	PN1: The 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.	EPA, 9/13/10
	PN2: 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.	EPA, 9/13/10
	PN3: 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 in 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10

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RECREATION		
General	R1: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	R2: 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.	Nita Vail, CEO, California Rangeland Trust, 10/13/10
	R3: 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.	Craig Thomsen, Rangeland Ecologist, Department of Plant Sciences, UC Davis, 10/18/10
	R4: Wind energy development is inappropriate at this site for the following reasons: • The region also provides countless opportunities for connecting the communities of the Bay Area and the Central Valley with nature and recreation.	Misha Popov, affiliation unknown, 10/01/10; Dana Stokes, Davis, CA, 10/07/10; Christopher Lish, Olema, CA, 10/13/10;

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		Wilderness Society et al, 10/07/10
	R5: Development may preclude recreational opportunities including public use of the ridge road and non-motorized use of the Bald Mountain Trail.	Dana Stokes, Davis, CA, 10/07/10
	R6: 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
REGULATORY PROCESS/PUBLIC INVOLVEMENT		
Scoping Period 10310	RP/PI1: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, Santa Rosa, 8/18/2010
	RP/PI 2: 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.	Geri Hulse-Stephens, President, California Native Plant Society Sanhedrin Chapter, 09/09/10
	RP/PI3: We also officially request a third scoping meeting, which we request to be held in Sacramento.	Bob Schneider, Senior Policy Director, Tuleyome, 09/08/10
	RP/PI4: 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan

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		Henson, California Wilderness Coalition, 08/17/10
	RP/PI5: 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 other son the important resources in this area.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
	RP/PI6: 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
	RP/PI7: 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10

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	RP/PI8: 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 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 the BLM is seeking to make decisions with far-reaching implications for the Walker Ridge are and the larger Berryessa Snow Mountain region.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
FWS Permits 20700	RP/PI9: 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.	EPA, 09/13/10
Public Access to Information 11500	RP/PI10: The public cannot fairly evaluate the proposed wind development without access to the wind data information. AltaGas 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	RP/PI11: 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.	Dana Stokes, Davis, CA, 10/07/10
	RP/PI12: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	RP/PI13: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 2/18/2010

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Public Communication 11000	RP/PI14: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 09/08/10
	RP/PI15: 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.	Bob Schneider, Senior Policy Director, Tuleyome, 09/08/10
	RP/PI16: However, the scoping meeting dates are buried in the BLM web site. To find the relevant information one must navigate through Walker Ridge 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 current 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	Bob Schneider, Senior Policy Director, Tuleyome, 09/08/10

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	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.	
SOCIAL AND ECONOMIC CONSIDERATIONS		
Increased land access/Illegal Poaching	SEC1: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
Drug Growing Issues on BLM Land	SEC2: 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	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10

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	waste and other general debris.	
Threatened Organic Status 65600	SEC3: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10
Property Values 65100	SEC4: 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.	Donlon Gabrielsen, Bear Valley Ranch LLC and Gabrielsen & Company, 10/11/10; Lucille Penning and Catherine Townzen, affiliation unknown, 10/11/10
	SEC5: 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.	Nita Vail, CEO, California Rangeland Trust, 10/13/10
Economic Feasibility 65200	SEC6: 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	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10

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	communities, renewable energy production itself has to be the primary benefit under consideration.	
	SEC7: 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.	Ellen Dean, Curator, UC Davis Center for Plant Diversity, 10/08/10
	SEC8: 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.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10
Public Subsidies 65300	SEC9: 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	Greg Suba, Conservation Program Director, California Native Plant Society, 10/23/10

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	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.	
Resource Potential 65200	SEC10: 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 indicated that the resource is at best marginal, and its development driven as much by public financial subsidy as by inherent worth.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, Santa Rosa, 8/18/2010
Project Value 65200	SEC11: 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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09
	SEC12: 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.	Ellen Karnowski, affiliation unknown, 10/18/10
Impact on Local Business 65500	SEC13: This industrial plant, if allowed, will have a disastrous effect upon my 145 year old business.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10
Job Creation	SEC14: 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 and have never experienced the level of unemployment that currently exists in the trades. We need jobs and the county needs the additional tax base. This project will also help California meet its 33% renewable goals by 2020. The wages paid to local workers will stay in the local area to stimulate the local economy.	Jack Buckhorn, affiliated with the Sonoma, Lake & Mendocino Counties Building and Construction Trades Council, 9/09/10
	SEC15: I am a representative of operating engineers, Local 3. Operating engineers is suffering over 30% unemployment in the industry in Lake County. Local 3 is fully supportive of the Walker	Chris Snyder, District Representative with

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	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 and employment pictures in Lake County.	International Union of Operating Engineers, Local 3, 9/09/10
	SEC16: 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.	A.C. Steelman, affiliated with IBEW, Local Union 340, 9/13/10
Compensation to Neighbors 65000	SEC17: 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.	Caleb Huynh, Clearlake Oaks, CA, 10/09/10
	SEC18: 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?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
	SEC19: 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?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
	SEC20: Will there be any compensation if our homes are rendered unlivable and impossible to sell? 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?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
	SEC21: 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?	Glenn Goodman, Clearlake Oaks, CA, 10/13/10

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	SEC22: 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.	Glenn Goodman, Clearlake Oaks, CA, 10/13/10
TRAFFIC AND TRANSPORTATION		
Base Rock Transport 50712	TT1: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
Impacts on roads 50740	TT2: 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.	L. Martin Griffin, Jr., date unknown
GENERAL COMMENTS		
General Support	GEN1: 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).	A.C. Steelman, affiliated with IBEW, Local Union 340, 9/13/10
	GEN2: Came down to support this project.	Johnny Ray McCoy, affiliated with IBEW, Local Union 340, 9/10/10
	GEN3: I'm in favor of wind projects in California. I just got done with Hatchet Ridge Project. This project sounds like another good one.	S.H. Konkol, affiliated with IBEW, Local Union 340, 9/10/10
	GEN4: We just finished 44 towers on Hatchet Ridge. We were here to support the project.	Dwight Evans, affiliated with IBEW, Local Union 340, 9/10/10
	GEN5: Lake County needs the revenue from this project. The EIR are not going to be an issue. Build America! Be Green.	Todd Fronsman, affiliated with IBEW,

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		Local Union 551, 9/09/10
	GEN6: I think that this is a great 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 the county.	Dennis Bradford, affiliated with IBEW, Local Union 551, 9/09/10
	GEN7: As an electrician, I have an obvious interest 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 Colusa Counties during the project.	Cynthia Moore, affiliated with IBEW, Local Union 340, 9/10/10
General Opposition	GEN8: 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).	Angela Amaral, City of Clearlake, 9/0710
	GEN9: I hope I never see a wind mill on walker ridge. Would much rather see a bald eagle.	Dan MotoXotica, unknown, 9/17/10
	GEN10: 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	Nicholas Battles and Kodie, unknown,

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	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.	10/04/10
	GEN11: 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 proponent 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, Davis, CA, 10/04/10
	GEN12: 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 windfarms exist nearby, such as areas disturbed by industrial use, agricultural lands, and lands with low resource values.	Samantha Pfeifer, Woodland, CA, 10/04/10; Roberta Millstein, Davis, CA, 10/06/10; Misha Popov, affiliation unknown, 10/01/10; Dana Stokes, Davis, CA, 10/07/10; Christopher Lish, Olema, CA, 10/13/10; The Wildnerness Society et al, 10/07/10S
	GEN13: Wind energy development is inappropriate at this site for the following reasons: • 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.	Misha Popov, affiliation unknown, 10/01/10; Dana Stokes, Davis, CA, 10/07/10; Christopher Lish, Olema, CA, 10/13/10; The Wilderness Society et al, 10/07/10; Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD,

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		Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
	More appropriate locations for large wind farms exist nearby in areas already disturbed by industrial use, agricultural lands, and lands with low resource values.	Dana Stokes, Davis, CA, 10/07/10
	GEN14: 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.	Edelgard Brunelle, Davis, CA, 10/04/10
	GEN15: 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.	Thomas D. Wendel, Sacramento, CA, 10/05/10
	GEN16: 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 viability of wind energy production there. Development there could have a huge impact on water and environmental protection.	Jean Crossley, unknown, 10/05/10
	GEN17: 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	Nijole King, unknown, 10/05/10

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	can be redeveloped, why destroy more nature?	
	GEN18: 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!	Mishika Rosendin, unknown, 10/06/2010
	GEN19: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	GEN20: 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.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	GEN21: 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.	Dr. Glen Holstein, Botanist, California Native Plant Society – Sacramento Valley Chapter, 10/08/10
	GEN22: 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	Lucille Penning and Catherine Townzen, affiliation unknown,

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	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.	10/11/10
	GEN23: 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.	Nita Vail, CEO, California Rangeland Trust, 10/13/10
	GEN24: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	GEN25: 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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	GEN26: 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.	Ellen Dean, Curator, UC Davis Center for Plant Diversity, 10/08/10
	GEN27: It is clear that this proposed development will have very significant impacts (short-term and	Bob Schneider, Senior

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	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.	Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09
	GEN28: 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.	Ronald Oertel and Somkiat Ashton, Woodland, CA, 10/11/10
	GEN29: 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."	Katherine F. Mawdsley, Davis, CA, 10/13/10
	GEN30: 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.	Michael J. Painter, Coordinator, Californians for Western Wilderness, 10/13/10
	GEN31: 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.	Michael J. Painter, Coordinator, Californians for Western Wilderness, 10/13/10
	GEN32: 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.	Ellen Karnowski, affiliation unknown, 10/18/10
	GEN33: As a lifetime defender of all types of birdlife, I request that you deny this huge commercial project and find a less-sensitive area.	L. Martin Griffin, Jr., date unknown
	GEN34: While CNPS supports the development of renewable energy in California, clean energy	Geri Hulse-Stephens,

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	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.	President, California Native Plant Society Sanhedrin Chapter, 09/09/10
	GEN35: 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.	Geri Hulse-Stephens, President, California Native Plant Society Sanhedrin Chapter, 09/09/10
	GEN36: 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 the 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.	Peter Warner, Rare Plant Chair, Sanhedrin Chapter, CNPS 10/11/10
	GEN37: 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.	Alice Bond, The Wildnerness Society; Johanna Wald, NRDC, Kim Delfino, Defenders of Wildlife, Lisa Belenky, CBD, Tara Hansen, CNPS, Ryan Henson, California Wilderness Coalition, 08/17/10
	GEN38: NO development in the Walker Ridge area!!!!!	Constance Turner, Coronado, CA, 10/07/10
	GEN39: 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	H. Blumenthal, Eureka, CA, 10/07/10

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	endanger so much of what we value and strive to protect year to year and day by day!	
	GEN40: Please put the environment first! Look around and see the devastation caused by "safe" exploration.	Carol Edgerton, Concord, CA, 10/07/10
	GEN41: Please do not develop Walker Ridge.	Jamaka Petzak, Glendale, CA, 10/07/10
	GEN42: 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.	Carol Garland, Rockport, ME, 10/07/10
	GEN43: 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.	Kevin Crupi, Negaunee, MI, 10/07/10
	GEN44: Please protect this area and do not proceed with the proposed project.	Derrick Canton, Stockton, CA, 10/07/10
Additional Information	GEN45: 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.	Richard Louis Miller, Owner, Wilbur Hot Springs, Colusa County, 10/12/10
PROJECT NOTIFICATION LIST		
Requests to be added to Project Lists	I would like to be added to the mailing list for the Walker Ridge project.	Angela Amaral, City of Clearlake, 9/0710
	Please keep me informed.	Dan MotoXotica, unknown , 9/17/10
	Please include me on your email distribution list to receive notifications about the project. I would like to receive an CD copy of the Draft and Final EIS when they are ready (From City of Lakeport Public Scoping Meeting Registration Card)	Dennis Bradford, affiliated with IBEW, Local Union 551, 9/09/10
	Please include me on your email distribution list to receive notifications about the project. I would like to receive an CD copy of the Draft and Final EIS when they are ready (From City of Colusa Public Scoping Meeting Registration Card)	Angie Fulcher, City of Williams, 9/10/10
	Please include me on your email distribution list to receive notifications about the project. I would like to receive an CD copy of the Draft and Final EIS when they are ready (From City of Lakeport Public Scoping Meeting Registration Card)	Roberta Lyons, affiliated with the Redbud Audubon Society, Inc., 9/09/10
	Please include me on your email distribution list to receive notifications about the project. I would	Chris Snyder, affiliated

Table 1 Summary of all Comments Received (by topic)

Resource/Issue	Comment	Commenter
	like to receive an CD copy of the Draft and Final EIS when they are ready (From City of Lakeport Public Scoping Meeting Registration Card)	with the International Union of Operating Engineers, Local Union 3, 9/09/10
	Please put me on the official notification list on all matters concerning Walker Ridge.	Samantha Pfeifer, Woodland, CA, 10/04/10
	Please put me on the official notification list on all matters concerning Walker Ridge.	Roberta Millstein, Davis, CA, 10/06/10
	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.	Professor Paul Friesema, affiliated with Northwestern University, Evanston, IL, 10/07/10
	Please include me on the official notification list for all matters concerning Walker Ridge.	Pamela S. Nieberg, Chair, Sierra Club Yolano Group, 10/06/10
	Please keep us informed on any additional opportunities for public comment, and do not hesitate to contact me at any time with questions.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 10/23/10
	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.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09
	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	Bob Schneider, Senior Policy Director, and

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	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 AltaGas and their representatives, including emails, faxes, telephone conversations and meeting notes.	Andrew Fulks, President, Tuleyome, 12/22/09
	Please ensure that Tuleyome is informed with respect to all actions on Walker Ridge, including all actions involving wind development.	Bob Schneider, Senior Policy Director, and Andrew Fulks, President, Tuleyome, 12/22/09
	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 AltaGas.	Bob Schneider, Senior Policy Director, Tuleyome, 09/08/10
	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.	Michael J. Painter, Coordinator, Californians for Western Wilderness, 10/13/10
MISCELLANEOUS		
Offer of Services	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*	Greg Erdmann, OCAS, Inc.

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Resource/Issue	Comment	Commenter
	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. P.S. We have been working on similar issues with the BLM field offices in Wyoming and Nevada.	
Request for involvement 11000	For your scientific studies in preparation of the DEIS we request that you involve Audubon California, whose executive director is Graham Chisholm, phone 510-601-1866	L. Martin Griffin, Jr., date unknown
	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.	L. Martin Griffin, Jr., date unknown
	We also request that you involve the Ornithology Department at the University of California at Davis, if they're not already involved.	L. Martin Griffin, Jr., date unknown
Inconsistency 21100	Section 1.1 describes a 7882 acre right of way, vs 8157 acres in 1.3.2.1.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
Document Text 21000	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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	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."	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10

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Proposed Correction 21000/21100	Table 1-4 states that Lake County building permits are regulated by the "public works department" instead of the Community Development Department.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
	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.	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
PPA Status	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?	Victoria Brandon, Redwood Chapter Vice Chair, Sierra Club, 10/13/10
Misc.	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.	Katherine F. Mawdsley, Davis, CA, 10/13/10

The following people submitted an unedited form letter in association with The Wilderness Society. To attribute this letter to all commenters, reference to these comments in the Comment Table is listed as The Wilderness Society et al.

Misha Popov
Joanne R. Johnson
Eileen Karsten
Michael Zelner
Mickey Lund
Liana Lovas
Michelle Palladine
Annabelle Travis

Sidney Robles
Brittany Adams
S. Hodges
Stephen Bohac
Seth Laursen
Joy Sweeny
Dan Esposito
Sam Child
Patrick Herman
John Delaney
Brenda Tobin
Martin Marcus
Rebecca Barker
Sibylle Hartmann
Rebecca Finley
Laura Herndon
Linda Trevillian
E Perkins
Virginia Williams
Eric Grant
Warren Hageman
Candace Hallmark
Brent Han
Joselynn Burton
Anje Waters
Don Meehan
Wendy Mashburn
Linda Whetstine
Christina Heon
Leticia Bayona
Anne Veraldi
David Root
Stephanie Linam
Merrily Robinson
Dirk Obudzinski
Kate Stemig

Randall Tyers
Heather John
Jan Fitcha
Steve Rouch
Patricia Maddock
Nancy Schwartz
Nathan Myers
Jim Koenig

Kim Alexander
Jennifer Bradford
Chris Petrakis
Millie Delaney
Jelica Roland
Jack McClain
Megan Adam
Bryna Hoffmeister
Karen Tiney
Allan Campbell
Jessie Osborne
Tom Nulty jr
Priscilla Gilbert
Jennifer Sellers
Maria Bustamante
John Chabowski
Phil Wells
Ewa Bartos
Steven Cook
Jennifer Robinson
Jonathan Daschle
Hans Deutsch
Mindi White
Susan Curtis
Ds Powell
William Briggs
Lauren OBrien
Sandy Gilbert
Mary Engstrom
John Austin
Sandra Commons
Claudia Wornum
Donna Jones
John Satchell
Yuko Nakajima
Dan Bell

Olivia Dawson
Leila Jackson
Margaret King
Alison Merkel
Allyson Frye-Henderson
Terry Poplawski
Noah Schlager
John Bigelow
Paulina Ramirez B.
Mazique
Kara Ayik
Christine Gorton
Mira Duong
Heather Gordy
Lee Baldwin
Victoria Wallace
Mr.& Mrs. Terry
Michael Stuart
Ruth-Ann Radcliff
Kathy Britt
Candi Ausman
Jennifer Head
Elizabeth Leaf
Joy Burns
Sandy Liu
Kendra Knight
Josephine Louie
Nancy Treffry
Joan Leaf
Mark Takaro
E Graham
Jena Rose
Marilyn Jasoni
Kathrin Kraft
Bryan Pearl
Lynn Flanagan
John Infantino
Kenneth Tabachnick
lee juskalian
Charles Binckley
Rachel Docherty
Corinne Greenberg
Keiko Martinez
Colleen Keith
Melanie Mangels

Mia Distasi
Judy Bradford
Albert Moreno
Rose Dallal
Luna Gooding
Sara Gigliotti
Teresita Callen
Beatrix Schramm
Jacqueline Lasahn
Jamie Conrad
Sakura Vesely
Fred Rinne
Sunny Thomas
Ron Avila
Zack Thomsen
Marion Barry
John Douglas
Sigrid Ramos
Stacie Charlebois
Robert Andrade
Kevin Moore
Debbie Richards
Barbara Voss
Carol Sawyers
Diane Densley
Corri Stephenson
Lois Corrin
Karen Babcock
Amy Kaplan
Lorena Wolfe
Peter Flanagan
Constance Turner
Jared Laiti
Mary Ann Gardner
Kevin Crupi
Corinne Cather
Cynthia Adams
Les Roberts
Karen Linarez
Theresa Shiels
Elaine Saldivar
Jessica Wodinsky
Deb Dearing
Ellen Koivisto
Bruce Mohr
William Talbott
Alycia Gillespie
Joan Scott
Tiesha Adams
Diane Bateson
Gaile Carr
Jennifer Bass
Irene Dunny
Julie Beer
Giovanna Martinez
Joe Salazar
Vic Bostock
Catherine Gauthier
James Helsing
Guy Lusher
Barbara Daniels
Marybeth Sharp
Cecly Corhett
Scott Gabel
D Rowe
Paul Hunrichs
Kristin Hurley
Leslie Friedman
Jamaka Petzak
Derrick Canton
Michael Barrows
Richard Churray
Vanessa Jenney
Raylene Holt
Elisabeth Bacus
Denise Vandermeer
Thomas Bragg
Susan Habecker
Joyce Reier
Martha Lemke
Susanne Johnson
Karen Magruder
Kat Raisky
Stacey Cannon
Hashi Hanta
Christina Begley
Rayanne Kirk
Jamila Garrecht
Rachel Hangley
Karen Valentine
Francine Arellano
Elaine Gorman
Diane Kastel
Lydia Silva
Jenna Ramsey
Frances Goff
Lisa Piner
R. Banat
Cynthia Loucks
Lisa Read
Patrick Sennello
H. Blumenthal
Carol Edgerton
Karen Garland
Robert Mason

4.0 SUMMARY OF FUTURE STEPS IN THE PLANNING PROCESS

The EIS process requires a team of interdisciplinary resource specialists to complete each step. An important part of the BLM planning process is engaging the public and relevant agencies from the earliest stages of and throughout the planning process to address issues, comments, and concerns. The steps of the planning process and agency authority and decisions to be made are described below.

Identification of Issues

Issues associated with the project were identified through the scoping period, which initiated the planning process. The scoping process and the issues identified through the scoping process are documented in this scoping report and from the BLM Ukiah Field Office.

Data Information and Collection

Much of the necessary resource data and information will be compiled and used from existing data on file at BLM Ukiah Field Office, or through other local agencies and academic institutions. Additional data and information will be obtained from current studies being conducted by BLM and others to supplement BLM's information.

Prepare Draft EIS

Based on collected data, including public comments, a description of the project and alternatives (including The No Action Alternative) will be developed. Only alternatives that meet a standard of technical and economic feasibility will be considered in detail. The alternatives will be responsive to issues identified through the scoping process, fulfill the purpose and need (as described in the EIS), be consistent with agency planning documents, and address key social and environmental concerns. Impacts that could result from implementing the project and alternatives will be analyzed and measures to mitigate those impacts will be identified where appropriate.

Draft EIS and Public Comment Period

Although BLM welcomes input at any time during the planning process, the next official public comment period will be open upon publication of the Draft EIS, which is anticipated to be in April 2011. This document will evaluate a range of project alternatives including a The No Action Alternative and a Preferred Alternative and will generally include the following:

- Summary
- Purpose and need for the project
- Description of alternatives (including the project)
- Affected environment
- Environmental consequences
- Mitigation measures to minimize impacts
- Other NEPA requirements

Upon completion of the Draft EIS, a Notice of Availability will be published in the Federal Register and a 45-day public comment period will follow. Copies of the Draft EIS will be distributed to elected officials, regulatory agencies, and interested members of the public. The document will also be available online at the Ukiah Field Office website: http://www.blm.gov/ca/st/en/fo/ukiah.html.

During this time, public hearings will be held to obtain public comments on the document. All activities where the public is invited to attend will be announced at least 15 days prior to the event in local news media. BLM will also receive written comments.

Respond to Comments, Prepare Final EIS and Record of Decision.

After the public comment period, the BLM will respond to comments and prepare a Final EIS. The availability of the Final EIS will be announced in the Federal Register, and a 30-day public protest period will follow. Copies of the Final EIS will be distributed to elected officials,

regulatory agencies, and interested members of the public. The document will also be available online at the Ukiah Field Office website: http://www.blm.gov/ca/st/en/fo/ukiah.html.

Following a 30-day Protest Period and concurrent 30-day Governor's Review, the BLM will resolve valid protests and prepare a Record of Decision, which is anticipated to be released on August 11, 2011. A Notice of Availability for the Record of Decision will be announced in the Federal Register.