UPC Cascade Wind Project

Comments for Adam Bless
prepared by Pacific Habitat Services, Inc.
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The following items describe issues that UPC needs to address prior to having its application deemed complete.

Comparative Sites

Throughout the application, and in Exhibit P in particular, comparisons are made between this site and other wind projects throughout the United States. These comparisons are used as a base line for determining potential impacts to various kinds of wildlife. However, none of the referenced sites match this site very closely in terms of habitat types and physiographic settings. The application should address these issues and explain in detail how each of the referenced sites can be used as an appropriate comparison to this site.

Habitat

The application should include more detailed site-specific habitat category delineations, which include the results of the referenced Spring 2007 studies, as well as all previous studies. The application should provide consistent descriptions of all habitats within the study area, and these descriptions should include discussions of plant community associations, wildlife species (particularly sensitive species) known or expected to occur within the habitat types, and rationale supporting inclusion of the habitats within specific habitat categories. Because the oak woodlands east of the Cascades have been identified by the Oregon Department of Fish and Wildlife (ODFW) and various conservation organizations as important habitats, additional evaluation of the oak habitats within the study area should be included in the discussion of habitat types. This information is needed to accurately assess impacts to wildlife associated with the direct loss of each of the habitat types within the project area. In addition to the direct loss of habitat associated with the construction of the facility, the evaluation of habitat impacts should include the secondary effects of forest fragmentation on wildlife as well as the cumulative effects associated with the loss of habitat.

Migratory Birds and Bats

This application should include a more thorough analysis of the proposed project's impacts to migratory birds and bats. Impacts to raptors, nocturnal migrant passerines, and bats have been documented at other wind energy facilities, but those facilities are located in different habitat types and/or physiographic settings, making comparisons to those facilities of little use in predicting impacts at the proposed project site. This application should include more detailed studies to document the migratory patterns of

raptors, passerines and bats through the project area. These studies should be designed to document the primary routes used by migrants, the locations of features that might concentrate migrants through specific corridors in the project area, and the altitudes at which the migrants fly, as well as the species and numbers of individuals involved. The results of these studies should then be used to evaluate the potential project-specific risks to migratory birds and bats.

Impact Assessment

The application should include more specific detail about the short- and long-term impacts. The study corridors surveys should be detailed enough to assess specific microsite disturbances at any location for roads, towers, staging, etc. A site-specific impact inventory protocol should be created to describe all trees, shrubs and herbaceous plants that will be removed or disturbed. This "impact inventory" should be used to identify the scope and design of the required mitigation.

Mitigation Details

The application should include a detailed mitigation plan that addresses short- and long-term impacts to vegetation and wildlife. The mitigation plan should include rationales for predicting success of the proposed actions; references to similar sites and revegetation projects; success criteria to be used; remedial strategies that would be undertaken if the mitigation does not function as intended; ownership and location of the proposed mitigation sites; and a discussion of how the mitigation sites will be protected into perpetuity. The proposed mitigation should be consistent with the goals and objectives of local and regional conservation actions, such as those described in the ODFW's Oregon Conservation Strategy.

Monitoring

The application should include a detailed monitoring plan that identifies specific survey locations and techniques to be used. It should include surveys of wildlife and plant species and populations. The monitoring plan should describe in detail what action will be taken, and where, if the mitigation does not function as intended.

ODFW and USFWS Recommendations

The May 30, 2007 letter to Adam Bless from Rose Owens, ODFW Habitat Specialist Project Coordinator, and the June 1, 2007 letter to Adam Bless from Nancy Gilbert, USFWS Field Supervisor, provide more detailed comments aimed at specific concerns related to each of the topics discussed above. The application should address all issues discussed in those letters.