



# United States Department of the Interior

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IN REPLY REFER TO:  
ER24/0419  
4111

October 25, 2024

Mark Daniel  
Clean Energy Coordination  
Department of Ecology  
P.O. Box 47709  
Olympia, Washington  
mark.daniel@ecy.wa.gov

Subject: PEIS Utility-Scale On-Shore Energy Programmatic Environmental Impact Statement, Washington State

Dear Mr. Daniel,

The Department of the Interior (Department) has reviewed the PEIS Utility-Scale Solar Energy Programmatic Environmental Impact Statement, Washington State. The Department offers the attached specific comments for use in developing the final environmental impact statement for this project.

We appreciate the opportunity to comment. If you have any questions or concerns, please don't hesitate to contact me at (503) 720-1212.

Sincerely,

T. Allison Hall  
Regional Environmental Officer

INTERIOR REGION 9 • COLUMBIA-PACIFIC NORTHWEST

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IDAHO, MONTANA\*, OREGON\*, WASHINGTON

\*PARTIAL

Document	Section	Page/para/line	Comment
Draft Wind PEIS summary	4.6.1.1	Pg. 81	Recommend including the Teradapt Spatial Priorities mesic habitat map to accompany these figures. Having the sole xeric map without it's accompanying "wet" habitat map feels like an incomplete picture of two of many important habitats within eastern Washington. The mesic model also does an excellent job delineating potential winter habitat areas for Columbian sharp-tailed and greater sage grouse. There is even a greater sage grouse spatial priorities map that would be helpful to include within this section as well.
Draft Wind PEIS	2.2	Pg. 9	Update image to include calculation of aerial acres of rotor-swept area per turbine size.
	2.2.1.1	Pg. 14	Update tower and wind turbine blade sections to better account for projected technologies and include the aerial acres of rotor-swept area per turbine size.
	Biological Information (Table 3)	Pg. 15	A new Periodic Status Review for Pygmy Rabbit in Washington was released in 2024. Recommend citing and linking to this report over the 2018 report which does not address recent habitat losses and population declines due to wildfire.
	4.6.3	Entire	Resolve with comments made in App E for bats.
	4.6.3.1	Pp. 88-89	Edit throughout dEIS and App E for bats: Most publicly available studies estimate between three to five bird fatalities per MW per year <b>but can vary greatly by site, with some sites reporting more than 30 bats per MW per year while others closer to 1 bat per MW per year.</b> (from p. 14 of the in-line link provided). <a href="https://www.nwf.org/-/media/Documents/PDFs/NWF-Reports/2019/Responsible-Wind-Power-Wildlife.ashx">https://www.nwf.org/-/media/Documents/PDFs/NWF-Reports/2019/Responsible-Wind-Power-Wildlife.ashx</a>
Draft Wind PEIS App. E Biological Resources Report	3.2.1.2	Pg. 19	Suggested edit in bold: Bats utilize snags, trees, crevices in rocks, <b>talus</b> , tunnels, buildings, bridges, caves, and mine shafts for roosting or hibernation.
	3.2.1.6.2	Pg. 24	Recommend including the Teradapt Spatial Priorities mesic habitat map to accompany this figure. Having the sole xeric map without its accompanying "wet" habitat map feels like an incomplete picture of two of many important habitats within eastern Washington. The mesic model also does an excellent job delineating potential winter habitat areas for Columbian sharp-tailed and greater sage grouse. There is even a greater sage grouse spatial priorities map that would be helpful to include within Appendix E as well.

	3.2.2.2.3	Pg. 28	Powerlines from dams on the Columbia River have already set up an electricity grid through historic greater sage grouse breeding (leking) areas that has severely impacted breeding success (e.g., raven habitat, noise, stress) and resulted in reduced population numbers. While Appendix E does mention habitat degradation, loss, and further fragmentation, it fails to address the compounding interacting factors the existing power grid has on these birds. What's missing is how increasing renewable energy infrastructure, particularly in Douglas County where many sites have had siting studies AND these birds are spatially constrained due to the current energy infrastructure, effects will be more concentrated than in other areas. It is understood that such considerations will be given when siting potential wind projects, but worth mentioning just how important this consideration is for this species.
	3.3.1	Pg. 53	Impacts to nests are only part of the concern for wind energy projects. Most wind facilities will have turbine collision concerns. Recommend revising this bullet to read: "Bald and Golden Eagle Protection Act (USFWS): Prohibits the take of bald and golden eagles without prior authorization from USFWS. A Wind Energy Incidental Take Permit may be recommended for mitigating mortality related to wind turbine operation. An Eagle Disturbance Take Permit may also be needed for construction activities near nesting sites."
	3.4.2.2.2	Pg. 63	Edit throughout document: Most publicly available studies estimate between three to five bird fatalities per MW per year <b>but can vary greatly by site, with some sites reporting more than 30 bats per MW per year while others closer to 1 bat per MW per year.</b> (from p. 14 of the in-line link provided in the dEIS). <a href="https://www.nwf.org/-/media/Documents/PDFs/NWF-Reports/2019/Responsible-Wind-Power-Wildlife.ashx">https://www.nwf.org/-/media/Documents/PDFs/NWF-Reports/2019/Responsible-Wind-Power-Wildlife.ashx</a>
	3.4.4.1.1	Pg. 72	For bullet starting with " <i>Conduct an assessment and possibly a literature review and consult with WDFW and USFWS to determine if bat surveys are needed...</i> " edit to encourage applicant's review to include querying NABat to inform nearest available bat survey data, and encourage applicant to conduct pre-construction bat surveys to establish baseline species presence ranging from ground to rotor-swept areas, especially if WNS status has changed in the project area since pre-existing surveys were conducted.
	3.4.4.1.1	Pg. 73	Suggested edit in bold: Avoid placing turbines near known bat hibernation, breeding, and maternity/nursery colonies, in known migration corridors, or in <del>known</del> flight paths between colonies and feeding <b>or watering</b> areas.