

From: Lott, Keith [mailto:Keith.Lott@dnr.state.oh.us]
Sent: Tuesday, January 27, 2009 2:15 PM
To: DeCaro, Dave
Cc: Megan_Seymour@fws.gov; Siegfried, Stuart
Subject: DOW Blue Creek letter response

See attached. <<DOW Blue Creek letter.doc>> <<Blue Creek map.pdf>> <<DNAP Blue Creek.doc>>

Keith Lott, Wind Energy Wildlife Biologist

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Ohio Department of Natural Resources

TED STRICKLAND, GOVERNOR

SEAN D. LOGAN, DIRECTOR

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26 of January, 2009

To all interested parties,

The following comments have been prepared based upon a review of Iberdrola's proposed Blue Creek Wind Project. The methodologies outlined within the January 6th 2009 letter are consistent with those suggested by the Division of Wildlife (DOW) in the *On-Shore Bird and Bat Pre- and Post-Construction Monitoring Protocols for Commercial Wind Energy Facilities in Ohio (OSMP)*, with one exception. Typically, the DOW suggests acoustic monitoring of bats at all meteorological towers situated onsite. Due to the extensive agricultural nature of the proposed site, and "minimum" risk classification, the DOW waives that recommendation and does not object to Iberdrola's plan to monitor only 1 meteorological tower. For future projects proposed within the state, it is suggested that all meteorological towers be appropriately equipped for raising and lowering acoustic monitoring devices before they are installed onsite.

As indicated in the accompanying letter, the Division of Natural Areas and Preserves (DNAP) database does not contain any records of rare, threatened, or endangered species within the proposed project area. Records from the DNAP database did indicate the presence of a small (10-15 nest) great blue heron rookery within the project boundaries. Though not specifically addressed within the OSMP due to their uncommon occurrence, heron rookeries are an area of concentrated activity and thus of greater concern. This rookery was last surveyed in 2003; therefore the DOW requests that the number of active nests be assessed. If active nests are found, the DOW requests that the activity patterns of those individuals be determined. Protocols should commence following similar methodologies as the raptor nest monitoring outlined in the OSMP. Monitoring should begin mid-April and continue through June (maximum of 14 visits). The DOW is also suggesting a ½ mile buffer of the rookery in an effort to minimize both direct and indirect impacts to the colony. This region is completely encompassed within the existing 500 meter buffer of 10 hectare forests, so no additional land need be set aside. If this project proceeds, particular effort should be made to avoid staging or operating machinery within this zone during the breeding season (February-July).

Much of the proposed project area is extensively agricultural (>95%). Wind turbine facilities located in similar habitat in other parts of the nation have been

shown to have negligible impacts on wildlife (with a few notable exceptions). The DOW supports the development of green energy in these low impact regions and looks forward to working with Iberdrola on this project.

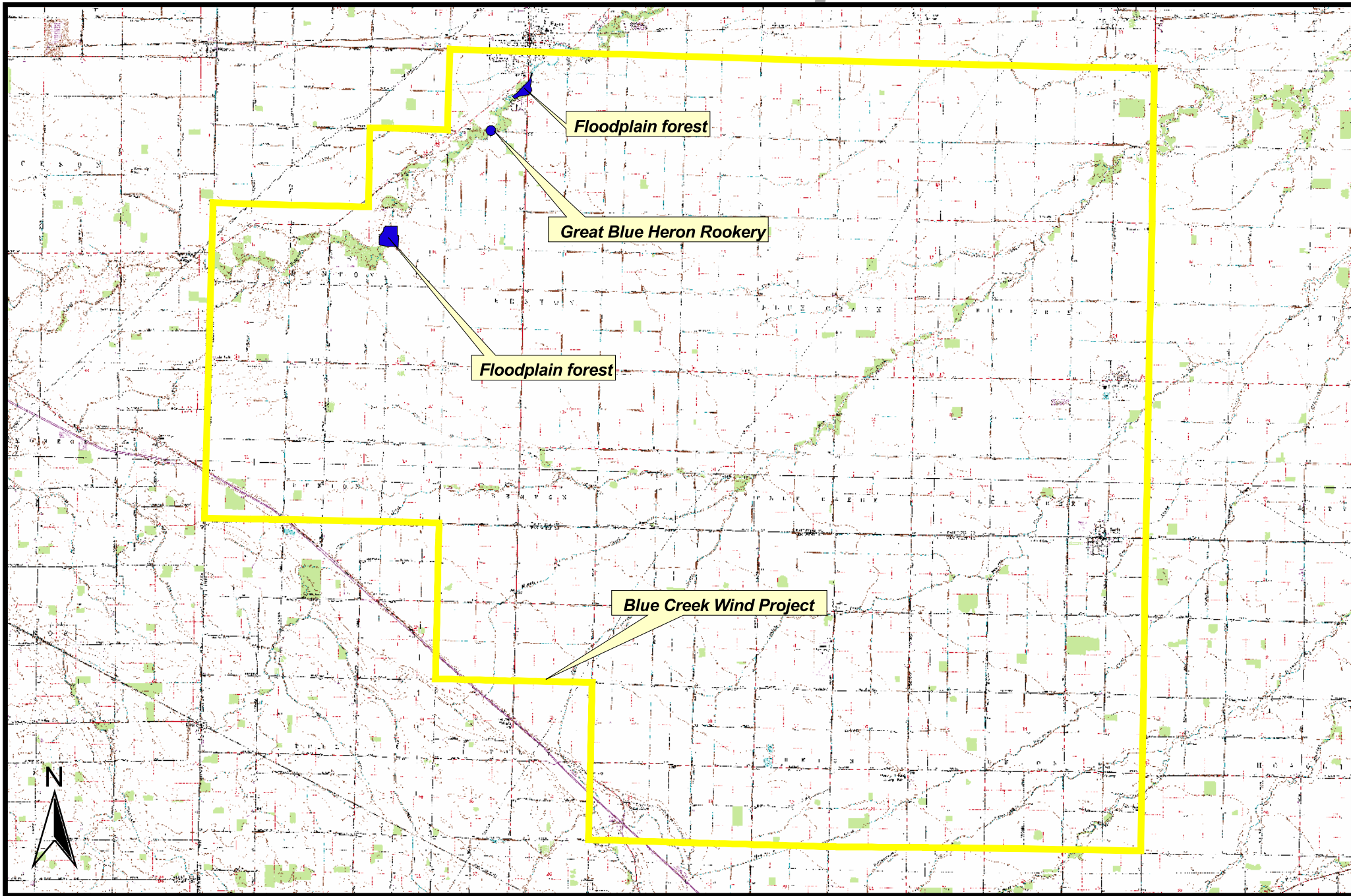
ODNR appreciates the opportunity to provide these comments. Please contact Keith Lott if you have questions about these survey protocols or need additional information.

Keith Lott, Wind Energy Wildlife Biologist

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cc: Mr. Stuart Siegfried, Ohio Power Siting Board
Ms. Megan Seymour, United States Fish and Wildlife Service

Blue Creek Wind Project



Division of Natural Areas & Preserves
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January 20, 2009

Keith Lott
ODNR Division of Wildlife
2514 Cleveland Road East
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Dear Mr. Lott:

After reviewing our Natural Heritage maps and files, I find the Division of Natural Areas and Preserves has no records of rare or endangered species near the ODNR Division of Wildlife Blue Creek Wind project. The site is located in Benton and Blue Creek Twps., Paulding Co., and Tully and Union Twps., Van Wert Co., Woodburn South, Payne, Latty, Dixon, Convoy, and Scott Quadrangles. However, the site is near a high quality Floodplain Forest. Best management practices should be employed to avoid impacting these areas. The site is also near a Great Blue Heron Rookery. Becky Jenkins of the Division of Wildlife should be contacted regarding possible impacts to rare animal species. She can be reached at (614) 265-6631.

There are no existing or proposed state nature preserves at the project site. We are also unaware of any unique ecological sites, geologic features, state parks, state forests, scenic rivers, or wildlife areas within the project area.

Our inventory program has not completely surveyed Ohio and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although we inventory all types of plant communities, we only maintain records on the highest quality areas.

Please contact me at (614) 265-6409 if I can be of further assistance.

Sincerely,

Butch Grieszmer, Data Specialist
Resource Services Group