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January 14, 2009

Via e-mail

Pam Eaton and Brian Weber
Co-chairs, Environment and Lands Working Group
Western Governors' Association
Western Renewable Energy Zones Initiative

Dear Pam and Brian:

Thank you for your leadership integrating environmental and land concerns into the Western Governors' Association's Renewable Energy Zones Initiative. The Initiative is truly a model for how to address environmental concerns early in the planning process to avoid costly delays at the site-specific stage that have the potential to impact important landscapes and wildlife habitat. Upon review of both the Environment and Land working group's categorization criteria (as of 1-6-09) and the exclusion and avoidance lists, I would like to bring to your attention a few additional Forest Service categories that appear to have been overlooked and are comparable to the current BLM categories already listed.

AVOIDANCE AREAS

In the current list of avoidance areas, "BLM RMP designated lands which may have development constraints, such as: Wildlife Management Areas" as well as "BLM Areas of Critical Environmental Concern (ACECs) for wind and solar" are listed. However, there are no corresponding categories for Forest Service lands and Resource Management Plans (Forest Plans), such as Management Areas emphasizing wildlife protection or Special Areas, in the list of avoidance areas.

1) In accordance with your current BLM RMP categories, the following Forest Service "Special Areas," which are administratively designated, should be added to the avoidance areas:

- Scenic, Geologic, Botanical, Zoological, Paleontological, and Historical Areas [FSM 2372, 36 CFR 294.1 (a)]
- National Natural Landmark and National Historic Landmark [FSM 2373, FSM 2363.1]
- Research Natural Areas [FSM 4063]

2) In accordance with your current identification of the "Pronghorn Migration Corridor (WY) Management Area," other special wildlife "Management Areas" should be added to the list of avoidance areas. By adding this general category, you will ensure to leave a placeholder for other areas not included on the list. An example of a Management Areas (MA) seeking protection for wildlife would be the Elkhorn Wildlife MA on the Helena National Forest.

3) Other important lands that have been recently identified in Forest Plans via regional wildlife assessments include the Southern Rockies Lynx Amendment in Forest Service Region 2 where

connectivity was identified as critical and 38 “Lynx Linkage Areas” were identified; and the Greater Yellowstone Grizzly Bear Forest Plan Amendment that applied to Forest Plans in 3 different Forest Service Regions surrounding Yellowstone National Park. These are but two examples and the Forest Service has many other wildlife rich areas that have been mapped, such as the old growth reserves that are part of the Northwest Forest Plan.

EXCLUSION AREAS

1) The following Forest Service Special Areas, that are statutorily designated, should be added to the list of exclusion areas, similar to the BLM categories that are already listed:

- National Monuments, National Recreation Areas, National Scenic Areas [FSM 2371]
- National Trails [FSM 2353.4]
- Wild and Scenic Rivers [FSM 1924 & 2354 FSH 1909.12 Chapter 80]

2) In addition, the Trapper’s Point ACEC designated through the Pinedale RMP should be added to the list of exclusion areas, similar to the “Jackson Pronghorn Migration Corridor (WY).”

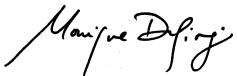
OTHER CONSIDERATIONS

We noticed that there is no Forest Service representative on the Environment and Lands Working Group, and recommend that you consider contacting a Forest Service representative to assist you with thoroughly integrating the above comments into your final screening process.

Also, it appears that the BLM ACECs have been divided into geothermal, solar, and wind. An explanation of this would be greatly appreciated.

Thank you for your attention to detail through this process, and I hope this information was helpful in ensuring that the final screening process for the WGA WREZ is as thorough as possible. Please don’t hesitate to contact me with any questions about these comments

Sincerely,



Monique DiGiorgio

cc: Environment and Lands Working Group

Shaun McGrath and Madeleine West, WGA

Gail Kimbell, USDA Forest Service Chief

Regional Foresters for USDA Forest Service Regions 1-6, and 10

Western Governors’ Wildlife Council