



*Forging a partnership between farmers and consumers.  
•Working together for Ohio's farmers•*

September 24, 2012

Public Comments Processing  
Attn: FWS-R3-ES-2012-0036  
Division of Policy and Directives Management  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive  
MS 2042-PDM  
Arlington, VA 22203

**RE: Comments on the Buckeye Wind LLC Draft Habitat Conservation Plan and Draft Environmental Impact Statement for the Indiana Bat in the Ohio Wind Project**

The Ohio Farm Bureau Federation (OFBF) is pleased to provide comments requested by the United States Fish and Wildlife Service (USFWS) concerning its evaluation of Buckeye Wind LLC's draft Habitat Conservation Plan (HCP) and Environmental Impact Statement as part of an application for an Incidental Take Permit concerning the *Myotis Sodalis* or Indiana bat. These comments are in response to FWS-R3-ES-2012-0036.

OFBF is a member organization whose mission is to forge partnerships between producers and consumers. Next to labor, energy is the largest single cost input in many farm and small business operations. Consumers living in rural, suburban and urban neighborhoods are looking for opportunities to control their energy costs. Farm Bureau members support the development of a diversified energy portfolio that employs a variety of fuels and technologies (advanced coal, nuclear and renewable) that help consumers create options to control their energy costs. Many members support creation of large scale renewable energy development projects as a vital part of rural economic development.

OFBF had the opportunity to work closely with a variety of stakeholders as a member of the Ohio Department of Development (ODOD) Ohio Wind Working Group from 2007 to 2010. Organization leaders worked with wind developers, citizens groups, ODNR-Division of Wildlife and USFWS representatives to focus on several environmental issues this HCP approval process is addressing today.

We understand that Buckeye Wind LLC proposes to construct and operate up to 100 wind turbines and associated facilities for 30 years in eastern Champaign County, Ohio. While approximately 80,500 acres are within the Buckeye Wind Action Area, about 130 acres will be used to accommodate wind turbines, access roads, transmission and maintenance facilities.

Creation of the first project has been approved by the Ohio Power Siting Board (OPSB). The company was issued a *Certificate of Public Need and Necessity* that involved both public and judicial hearings allowing the applicant, citizens groups and local government opportunities to examine and discuss a variety of environmental, aesthetic and economic issues. OFBF participated as a party of first record in these proceedings. Information concerning these evaluations can be found in OPSB Case #08-0666-EL-BGN.

Buckeye Wind LLC is in the process of having the second project approved. Again, the applicant, citizens groups and local government have opportunities to examine and discuss issues concerning the project. OFBF has been recognized as a party of record in these proceedings also. Information concerning these evaluations can be found in OPSB Case #12-0160-EL-BGN.

Habitat for *Myotis Sodalis* is found throughout the Buckeye Wind Action Area. Construction, operation, maintenance and decommissioning may have the potential to harm, harass or kill specimens of this endangered species.

Buckeye Wind LLC's HCP was created in accordance with Section 10 of the Endangered Species Act. The plan addresses conservation needs for the Indiana bat, including measures to avoid and minimize takings. Mitigation strategies protecting and enhancing existing habitat, monitoring takings through post-construction mortality studies and adaptive management steps are presented. Moreover, the company will fund research to better understand Indiana bat and wind turbine interaction.

While all turbines in the project will be built in open farm fields that are not considered by many experts as prime habitat for *Myotis Sodalis*, many of the woodlots, tree lines and fence rows linking farm fields throughout the area could be. Monitoring mortality rates will include surveying open farm ground where issues concerning soil compaction and crop damage could be a concern.

Farm Bureau leaders will work with the wind developer, USFWS personnel, researchers and other interested parties to create effective strategies where HCP objectives can be achieved. These efforts could include education/outreach projects and cooperation agreements between all stakeholders.

We understand that the USFWS evaluated several case scenarios as part of its evaluation process. Options focusing on minimal and maximum operational restrictions, as well as "no action" alternatives were explored. OFBF policy supports the proposal whereby USFWS issues a permit specifying modified turbine operations, as described in Buckeye Wind LLC's HCP.

Striking a balance for energy and environmental policy, the USFWS and Buckeye Wind LLC have an opportunity to create a process where communities can invest in a diversified energy portfolio while addressing needs for effective wildlife habitat. What can be established in Ohio can be repeated in other states. We look forward to working with you as this process continues.

Thank you for your time and consideration.

Sincerely,



John C. Fisher  
Executive Vice President  
Ohio Farm Bureau Federation

CC: Ohio Congressional Delegation  
Ohio Farm Bureau Board of Trustees