UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUN 2 7 2012

Matt Blevins
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

Subject: Final Environmental Impact Statement for Grapevine Canyon Wind Project, Coconino County, Arizona [CEQ# 20120181]

Dear Mr. Blevins:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Grapevine Canyon Wind Project, Coconino County, Arizona. Our comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement and provided comments to the Western Area Power Administration on September 13, 2010. We rated the DEIS as *Environmental Concerns–Insufficient Information* (EC-2), primarily due to potential impacts to aquatic resources and biological resources. We expressed concern about the lack of detail provided in the DEIS on the design and layout of the proposed wind park and noted that it is difficult, if not impossible, to evaluate the full extent of impacts without more specific information. We asked for a final determination of the geographic extent of jurisdictional waters, and demonstration of compliance with Clean Water Act Section 404. In addition, we recommended a more robust analysis of air emissions from construction, vehicle use, and equipment use. Finally, we urged that additional pre-construction surveys for raptors and bats be completed prior to siting turbines and that the Avian and Bat Protection Plan be included in the FEIS.

We appreciate the efforts of Western, the Applicant, and consultants to respond to our DEIS comments, and we commend the Applicant, State, and federal agencies for developing additional resource protection measures that support environmentally preferable outcomes. In particular, we note that the FEIS contains more detailed information on the layout of the proposed wind park, including illustrations depicting the build-out phases of the wind park area. The FEIS also includes more detailed information on the geographical extent of jurisdictional waters and potential impacts to them. We are pleased to see that these waters will largely be avoided and potential impacts are expected to total only about one-half acre for the initial phase of the project. We note, however, that the U.S. Army Corps of Engineers has not verified the preliminary jurisdictional delineation and issued a final jurisdictional determination. The Record of Decision should include a final determination of the geographic extent of jurisdictional waters, based on the approved JD.

We are pleased to see that the FEIS includes an expanded, quantitative analysis of air emissions for the construction of the proposed project, as recommended in our DEIS comment letter. We also submitted detailed recommendations on best management practices to minimize fugitive dust and equipment emissions. Some of our recommendations were incorporated within the resource protection measures, while others were not. For example, we recommended that, when hauling material and operating non-earthmoving equipment, speeds be limited to 15 miles per hour. Likewise, for earthmoving equipment, we recommended limiting speed to 10 mph. Current resource protection measures, however, only restrict vehicles traveling on unpaved surfaces to 25 mph. We advise implementing more stringent speed limits, as suggested above, to more effectively minimize dust formation. We also recommend adopting speed limit requirements for both the construction and operation phases of the proposed project.

The FEIS also includes additional information about biological resources, including updates on bald and golden eagles, raptors, songbirds, and other wildlife species. As recommended, pre-construction surveys of bald and golden eagles were conducted within a 10-mile range of project components. Additional studies documenting the availability of concentrated prey have also been completed, and the placement of wind turbines near prairie dog towns has been minimized, as suggested. We understand that post-construction surveys will be used to inform adaptive management measures implemented for the initial phase of the project and siting decisions in subsequent phases. Finally, we note that the FEIS includes additional resource protection measures, as well as an update on the consultation process with the U.S. Fish and Wildlife Service.

EPA appreciates Western's coordination to date and the opportunity to provide additional input on this Project. Please send one hard copy and one CD ROM copy of the ROD to us when they are filed with our Washington D.C. office. If you have any questions, please contact me at (415) 972-3521, or contact Ann McPherson, the lead reviewer for this project. Ann can be reached at (415) 972-3545 or mcpherson.ann@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office

cc: Sally McGuire, U.S. Army Corps of Engineers
Shaula Hedwall, U.S. Fish and Wildlife Service
Reuben Ojeda, Arizona State Land Department
Mike Dunbar, Coconino National Forest
Chairman Leroy Shingoitewa, Hopi Tribe
Chairman Ben Shelley, Navajo Nation
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