Bureau of Land Management  
Transwest Express Transmission Project  
Wyoming Land Office  
5353 Yellowstone Road  
Cheyenne WY 82009  
Attn: Sharon Knowlton  

30 September 2013  

To Whom It May Concern:

Thank you for the opportunity to provide some insight and suggestions for the EIS for the Transwest Express Transmission Project. As a non-advocacy, science-based organization, we support thoughtful development of our resources to support a growing demand for renewable energy. This involves being aware of the repercussions of development on our shared wildlife resources. We hope that our comments are helpful to you as you move forward in the planning process.

HawkWatch International (HWI) is a 501(c)3 non-profit science-based raptor conservation organization. We have specific information regarding raptor nesting, migration and winter use for areas that are directly impacted by much of this transmission project, including southern Wyoming, Northwestern Colorado, and a large portion of the proposed project corridor through Utah. Because our organization focuses on entire landscapes, and has worked with BLM field offices throughout the region, we have a large dataset comprised of historical raptor nesting records that encompasses much of the proposed region. We urge Transwest to consult with us, and other non-governmental organizations that have similar histories of landscape-scale monitoring of wildlife populations (e.g. Rocky Mountain Bird Observatory, Audubon) to gain a better understanding of the cumulative impact of construction and strategies to avoid disturbance during construction, throughout the project life and decommission.

All proposed alternative routes for the project could have impacts on local raptor populations, and so it is absolutely imperative that the applicant thoroughly investigate historical nesting records, current nesting birds (within the same time-frame as construction), migratory patterns, and landscape use to develop their APP or BCS (Avian Protection Plan and/or Bird Conservation Strategy). We would like to commend the project applicant on their commitment to creating a sound strategy for minimizing and mitigation disturbance to raptors.
When analyzing the impacts on raptors, we have specific suggestions about timing and duration of surveys to be completed. With respect to nesting season, we advise the applicant to complete thorough surveys within 1 mile of the final project corridor as close to construction time as possible. Multiple-year surveys would be best, as it is well documented that most raptor species will use different nests in consecutive years, and will often skip years between nesting events and use. At the very least, areas of the project with continual activity (e.g. transformer stations, etc) that may create sustained disturbance through the life of the project should be thoroughly surveyed for nests for more than one year, to ensure the least amount of disturbance to nearby populations. We would also like to urge the applicant to consider completing year-round surveys for raptors, as fall and spring migrating and over-wintering birds may be impacted in areas near the corridor. HWI has extensive knowledge of migration trends from over 30 years of experience, and are currently ground-truthing a model that predicts important ridgelines for migrating birds. The winter is often an overlooked season for analyzing impacts to raptor populations. This can be problematic due to the fact that during this season, raptors are non-territorial, and therefore will occur in higher densities in areas of high resources. It is often over the winter that more mortalities occur due to electrocution or collision.

While the Audubon IBAs and USFWS BHCRs are an excellent way to analyze and determine strategy for minimizing impacts to birds, we feel that concentrating more resources to these areas might neglect impacts to many raptor species that do not occur there. These IBAs and BHCRs often focus on important water habitats (e.g. riparian, lakes, wetlands, etc.). These habitat types are indeed important for some raptors, including Northern Harriers, Osprey and Bald Eagles, over-emphasizing these habitats would potentially overlook impacts to other raptor populations that are associated with upland habitat types, such as the Golden Eagle, a species of increasing regulatory and conservation concern due to potential population declines throughout the West.

With respect to the applicant proposed and agency preferred routes, we support agency alternatives in Region I and II that reduce impacts to greater sage-grouse habitat and other wildlife (Alternative I-D and Alternative II-B, respectively.) We also support the agency preferred route for region III, as it bypasses some known raptor nesting areas as well as some potential raptor habitat through the Southwestern part of Utah near ridgelines and mountains.

As stated in the EIS document, lattice towers with guy lines present a bigger danger for bird collisions. As such, we urge adoption of the self-supporting steel lattice tower or tubular steel tower to avoid guy lines which increase the chances of avian collision, as outlined in the document.
Thank you again for allowing us to include our comments. Please let us know if we could be of any further assistance.

Sincerely,

Kylan Frye, M.E.M
Conservation Biologist
kfrye@hawkwatch.org
(801) 484-6808 ext 106

Dr. Steven Slater, Ph.D
Conservation Director
sslater@hawkwatch.org
(801) 484-6808 ext 108