



Larimer County Natural Resources
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Fort Collins, CO 80521
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June 30, 2011

Mr. John Stover
Environmental Specialist
Western Area Power Administration
PO Box 3700
Loveland, CO 80539

Subject: Windy Hollow Wind Energy Project, Laramie County, Wyoming

Dear Mr. Stover:

Thank you for the opportunity to comment on the proposed Mariah, LLC-Windy Hollow Wind Energy Project interconnection with the Archer-Hayden transmission line. This letter represents collective comments from four of the six primary land conservation partners in the Laramie Foothills Mountains to Plains Project, a collaborative conservation project in Larimer County, Colorado. The partnership is highly interested in protecting our collaborative citizen-driven conservation efforts and the substantial investment of public dollars in this significant landscape. The Laramie Foothills is generally defined as the landscape of northern Larimer County, Colorado and southern Laramie County, Wyoming. We are very much concerned about the potential impacts, ecologically, culturally, visually and recreationally from wind development on this landscape as currently proposed (see attached Laramie Foothills Project Area map).

The locations proposed for the Windy Hollow wind towers would be highly visible from the Big Hole Open Space, Belvoir Ranch, Red Mountain Open Space, and Soapstone Prairie Natural Area, as well as the greater Laramie Foothills Mountains to Plains Project landscape. Wind towers shown to be located adjacent to the Big Hole Open Space portion of the Belvoir Ranch will have the greatest impact to recreational, scenic and environmental resources on this significant open space resource which is further protected by a conservation easement held by The Nature Conservancy.

Wind towers are not compatible with protection of ecological resources primarily due to the large-scale fragmentation of habitat associated with the roads, transmission lines, and infrastructure and direct loss of avian species from rotors. The Laramie Foothills are also ranked as a "B2", or extremely high conservation site by the Colorado Natural Heritage Program for its globally significant, biological diversity values. Thus, the Laramie Foothills is a high priority landscape-level conservation site. The Laramie Foothills contains one of the most extensive high-quality foothills ecosystems remaining along the Front Range of Colorado and Wyoming, and includes numerous rare species that have been recorded.

Further, because wind towers are required by FAA to have lighting on them, they would have impact on recreationists, and the goal of a maintaining a dark sky as noted in the various open space management plans including specifically on page 51, "Shape Section" Belvoir Ranch and Big Hole Master Plan (2008), (document may be found at <http://www.belvoirranch.org/planningprocess/index.php>). This is a beautiful landscape with rolling foothills grasslands interlaced with arroyos and intermittent stream beds, tall buttes, rocky escarpments, hogback ridgelines, exposed geologic layers in multitudes of colors, shrub-covered low hills and pockets of tree covered slopes. It is tremendously significant

to our Front Range community members that this is literally the last place in the mountains to plains transition zone where one can enjoy uninterrupted natural beauty for miles.

On the abutting Big Hole Open Space, Soapstone Prairie Natural Area, and Red Mountain Open Space properties, over 40 miles of trails interconnect and provide outstanding non-motorized recreation including hiking, mountain biking, horseback riding, bird watching and numerous educational opportunities.

The Laramie Foothills region boasts phenomenal cultural resources including ruts from the Overland Trail, tepee rings, signature rocks, and buffalo jumps and wallows. In particular, the Lindenmeier Site (a National Historic Landmark), located on Soapstone Prairie Natural Area (just one of over 175 documented archaeological sites in the near vicinity) is described by The Archaeological Conservancy as one of the most important early-human sites in North America. Archaeological sites are only now being more widely catalogued in this region and have proven to be extensive throughout the landscape. There is a strong economic and cultural tradition of agriculture in the Laramie Foothills as well. Much of the conserved land in this area is currently utilized for agricultural production, primarily cattle grazing and hay production and we believe that the Laramie Foothills area will play a fundamental role in sustaining agriculture and the agricultural heritage in this portion of the County, which increasingly is being fragmented by ex-urban development.

These public properties in questions have also received local, statewide and national press and acclaim, even appearing in National Geographic, for their national significance in landscape-scale land protection efforts and specifically the archaeological significance of the area. Since opening to the public in 2009, they are even more widely known and have become favorite destination points for recreationists, wildlife watching enthusiasts, botanists and school groups as well as highlighted for educational tours as part of Colorado State University's international conservation professional exchanges, among others.

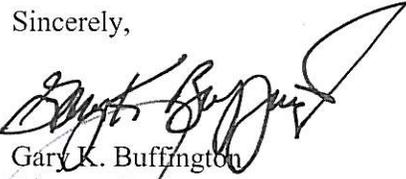
If it is decided to move forward with wind power development, we propose a buffer to set back wind towers from the south and east boundaries of the project area and to eliminate wind towers and associated facilities currently shown along the southeastern portions of the project boundary perimeter (which would include all those shown in sections 11 and 15) as these are the least desirable to develop for wind power due to ecological, recreational, scenic and cultural resource impacts to adjacent lands.

Similarly, based on the known presence of rare plants, plant communities, wildlife and archaeological resources in this region, we believe that a full ecological and archaeological study should be conducted and that all facilities associated with wind development be located to minimize or avoid impacts to these resources.

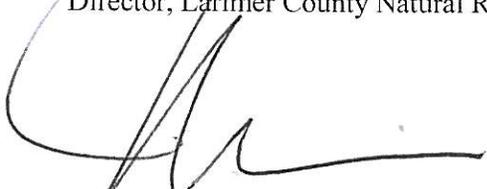
Since 1987, the partners (the City of Cheyenne, Larimer County, The Nature Conservancy, City of Fort Collins, Great Outdoors Colorado and Legacy Land Trust) have spent tens of millions of dollars to protect over 90,000 acres of land through fee-title and conservation easement in the Laramie Foothills Mountains to Plains Project. This public investment is one that we would like to see maintained by protecting the important ecological, cultural, visual and recreational resources that are recognized at the local, state, regional, national, and even international, level.

To summarize, if it is decided to move forward with wind power development, we would favor comprehensive assessment of natural and archaeological resources to minimize on-site impacts and request consultation via the United States Fish and Wildlife Service Draft Land-based Wind Energy Guidelines, Best Management Practices (BMPs) currently being developed by state and other wind energy related entities and organizations such as the American Wind Wildlife Institute. Similarly, we support a setback and elimination of wind towers and associated facilities currently shown along the southeastern portions of the project boundary perimeter (which would include all those shown in sections 11 and 15) due to ecological, recreational, scenic and cultural resource impacts to adjacent conservation lands. Please feel free to contact any of us directly if we can answer any questions.

Sincerely,



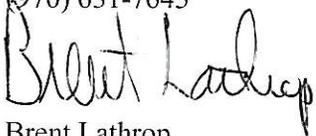
Gary K. Buffington
Director, Larimer County Natural Resources Department



John Stokes
City of Fort Collins
Director, Natural Resources Department

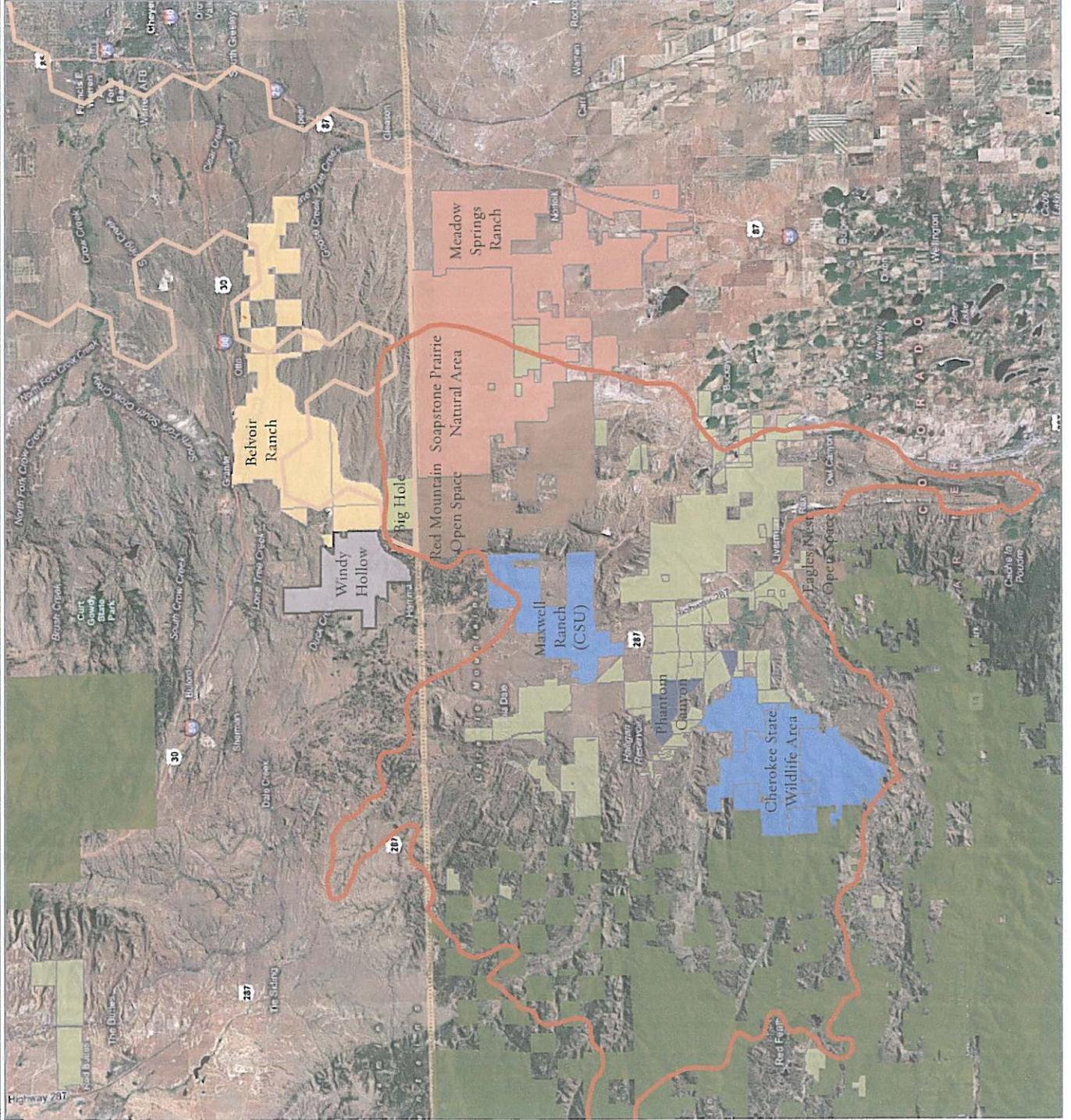


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LARAMIE FOOTHILLS PROJECT AREA



Legend

 Windy Hollow Wind Project Area

TNC Conservation Areas

 Laramie Foothills C.A.

 Mountains to Plains C.A.

Land Ownership & Protected Lands

 Forest Service (USFS)

 State (CO)

 Larimer County (CO)

 City of Fort Collins (CO)

 City of Cheyenne (WY)

 The Nature Conservancy (fee)

 Conservation Easements



Map produced by Amy Poczewicz, The Nature Conservancy in Wyoming, June 29, 2011.

