

FRIENDS OF BEAUTIFUL PENDLETON COUNTY, Inc.

*PO BOX 218
FRANKLIN, WV 26807*

*To preserve our rich heritage, protect the precious natural environment and
ensure citizens receive responsible, factual information*

January 20, 2008

Wind Energy Proposed Directives
Attention: Director, Lands Staff
4th Floor-South
United States Department of Agriculture Forest Service
1400 Independence Avenue, SW.
Mail stop 1124
Washington, DC 20250

Gentlemen:

Friends of Beautiful Pendleton County, Inc. was formed by concerned citizens and landowners in Pendleton County, West Virginia to preserve our rich heritage, protect the priceless natural environment, and ensure that citizens receive responsible, factual information. We have endeavored to determine the possible impacts of the proposed Forest Service Directives for Wind Energy on Pendleton County, which is approximately thirty eight percent national forest consisting of both the Monongahela National Forest and the George Washington National Forest.

We value this opportunity to comment on the draft directives. Given the complexity of the proposed changes, the level of expertise within our group and the multitude of documents where additions and changes are found, we struggled in the performance of a comprehensive analysis and the determination of the possible affects for Pendleton County and its national forests areas.

Our comprehensive analysis started with the USDA Forest Service website and the Forest Service Mission, Motto, Vision and Guiding Principals. We have concluded that it is impossible to justify any Forest Service decision to permit the industrialization of one acre of the 193 million acres, including the pristine mountain tops in the pristine National Forests of Pendleton County, West Virginia, of the Commons placed under its management by “We the People” with industrial wind energy projects. It just doesn’t fit, It doesn’t fit the Mission, It doesn’t fit the Motto, It doesn’t fit the Vision and It doesn’t fit the Guiding Principals. The current political wind is in favor of the development and energy interests, thereby significantly influencing the pressure on the natural environment. If the trend continues, how much of the National Forest will remain when our fast expanding population will likely be desperate for a little breathing room in the future, 25, 50 and 100 years from today?

We disagree with the conclusion under “Energy Effects” stating “To the contrary, the proposed directives could have a positive; rather than a negative effect on the supply, distribution, or use of energy”. Our research shows that the cost to the environment of siting industrial wind energy facilities on the ridge tops of the mountains in the Mid-Atlantic Region, including those in Pendleton County, West Virginia is disadvantageous compared to the benefit on the supply and distribution of electricity to the grid. So much would be lost to accomplish so little. For example, let's imagine an industrial wind facility with a rated capacity of 200MW, which has 100-2MW turbines, each over 400 feet high, all of them placed on the top a forested ridge. This installation would span nearly 20 miles, require

the clear-cutting and disturbance of nearly 2,000 acres, including access roads and the operations, maintenance and storage buildings and much of the mountaintop would be dynamited to prepare it for a hundred huge concrete pads to anchor each turbine. Much attention is focused on the aesthetics of the superstructures of the wind turbines, higher seems to be better as 300 to 550 feet is current technology, to be located on the mountains. Little or no consideration is given to the potential damaging effects caused by the infrastructure.

Potential damages that we have identified are caused to or from:

1. Roads
 - Existing road structure alterations to provide for transportation of hundreds of oversized loads of turbine components, construction equipment and concrete transport vehicles
 - New access roads onto the project site
 - Miles of new tracts and access roads between the turbines
 - Miles of new or substantially improved tracts and access roads throughout the transmission line properties from the turbine site substation to the grid connection substation
2. Trenches
 - Miles of trenches between the turbines for underground transmission lines
 - Trenches for connection to the turbine site substation
 - Drainage lines from the concrete foundations for the turbines bases during construction
3. Foundations and property disturbance
 - Huge concrete foundations for the turbines
 - Huge landing pads for equipment (cranes, dozers etc.)
 - Huge landing pads for turbine components
 - Concrete production on site requires huge landing pads for the plant, gravel and sand aggregates, hoppers for cement, mixer and dump truck parking areas and washout facilities for tanks and mixers
4. Mountain top
 - Disturbance to include clear cutting of acres of trees and foliage to increase wind speed at the turbine blades
 - Drainage
 - Surface water runoff
5. Hydrology
 - Underground water courses damaged, diverted or polluted
 - Ground water courses damaged, diverted or polluted
 - Residential water sources damaged, diverted or polluted
 - Other users affected by the abstraction of water from the nearby river or other sources
6. Habitat loss
 - Loss or irreversible changes
 - Clear cutting of the trees and other foliage
7. Right of ways
 - Blocked, disrupted or damaged
8. Substation
 - Construction
 - Industrial appearance
 - Light pollution
9. Grid connection

- Miles of overhead power cables and pylons linking the turbine site substation to the grid connection substation

10. Collateral

- Damage to the surrounding road network by hundreds of vehicles transporting oversized loads of turbine components
- Damage to the surrounding road network by hundreds of vehicles transporting ready mixed concrete or aggregates and other components for concrete production on site
- Impact on towns by hundreds of oversized loads transporting turbine components
- Impact on towns by hundreds of oversized loads transporting ready mixed concrete or aggregates and other components for concrete production on site
- Traffic chaos
- Comprehensive plan, procedures and personnel training
- Comprehensive budgets
- Backup procedures for support from required levels federal, state and county agencies

11. Concrete production and transport

- Pollution issues of the batching plant offsite or onsite
- Pollution issues of the transportation vehicles offsite or onsite
- Environmental audit

12. Noise pollution issues of vehicles and equipment during construction phase

- Clear cutting the mountain top
- Mountain top drainage construction
- Road construction
- Trench construction
- Turbine foundation construction
- Concrete production (onsite or offsite)
- Turbine erection
- Landing pad construction for equipment (cranes, dozers, on site concrete production requirements etc.)
- Turbine site substation construction
- Transmission line construction
- Grid connection substation improvements construction and connection thereto
- Vehicles transporting oversized loads of construction equipment
- Hundreds of vehicles transporting oversized loads of turbine components
- Hundreds of oversized loads transporting ready mixed concrete or aggregates and other components for concrete production on site

13. Noise pollution issues to excavate turbine foundations and trenches during construction phase

- Dynamiting

14. Noise pollution issues of equipment during operations phase

- Turbine operation from blades and generators
- Maintenance equipment
- Maintenance vehicles

15. Light pollution

- Turbine lighting
- Substation lighting
- Black zone affect

16. State and county emergency service requirements and responsibilities

- Comprehensive plan, procedures and personnel training
- Comprehensive budgets

- Fire fighting equipment
- Special fire fighting procedures and personnel training
- Ambulance equipment
- Other emergency equipment as required
- Backup procedures for support from required levels federal, state and county agencies

17. Comprehensive environmental impact study and report should be mandatory, scrutinized, questioned and verified

18. Fully comprehensive detailed carbon audit should be a mandatory part of the comprehensive environmental impact study, scrutinized, questioned and verified
 - Does it take into account the carbon audit for the mining of metal ores used in the manufacturer of turbine components
 - Does it take into account the carbon audit for the mining of metal ores used in the manufacturer of transmission line pylon components, if metal poles are used
 - Does it take into account the carbon audit for the cutting of trees used in the production of components transmission line pylon components, if wooden poles are used
 - Does it take into account the chemicals used in the manufacturer of the blades: fiberglass, polyester epoxy resin
 - Does it take into account the materials used in the manufacturer of the giant spools of electrical cable
 - Does it take into account vehicle fuel emissions from transporting turbine components, concrete or concrete components, on site equipment, transmission line pylons, transmission line cable and other materials
 - Does it take into account the carbon audit for the drilling and manufacturer of the total fuels and lubricants consumed from start to finish
 - Does it take into account emissions from mining and production of cement, aggregates and other components for the production of cement
 - Does it take into account emissions from the fuel used by the huge construction equipment
 - Does it take into account the loss of CO2 absorptive capacity of clear cutting trees and foliage

19. Culture and history
 - Comprehensive cultural and historical impact studies and reports should be mandatory, scrutinized, questioned and verified

Considering the infrastructure damage resulting from siting large industrial wind energy facilities and the results of a genuine environmental audit, it becomes very clear that the production of wind generated electricity is far removed from the clean and green image portrayed by the large corporate developers. Therefore, infrastructure and carbon audits should demand close attention and review by all decision makers in wind power decisions and applications.

A major reason for the increasing opposition to the development of large industrial wind projects is loss of visual amenity, the effects of highly visible vertical man-made structures with rotating blades located in predominantly horizontal, static natural hillsides. The loss of beautiful scenery, favorite views and inspiring landscapes are objections dismissed by large corporate developers as emotional and subjective. Locating large industrial wind projects in the National Forests or for that matter in the scenic mountains throughout the world is inappropriate. They are in the wrong place. That assessment is neither emotional nor subjective.

The claims of the benefits of industrial wind energy facilities on important public policy goals, such as the reduction in our use of imported petroleum, green house gas emissions and electrical grid reliability have been proven to be non-existent.

The claim that industrial wind energy facilities will reduce our use of imported petroleum is false. The explanation by Jon Boone under misleading industry claims at www.stopillwind.org follows.

“Foreign Oil

Wind only generates electricity. Electricity generation is only part of our energy production. Sixty percent of the nation's energy use does not involve the making of electricity. Coal and gas-fired power plants do pollute the air with toxic hydro-carbons. But the sheer volume of automobile exhaust combined with home heating demand are major contributors to the problem. It is folly to suggest that thousands of wind turbines blanketing the mountains of the eastern US would do anything of significance to mitigate these other energy forces evidently contributing to the warming of the planet. Allegheny Power, the major electricity provider in the region including Western Maryland, reports that oil accounted for 1% of the resources used to generate its power in 2004. Nationwide, this figure is less than 3%. Even if industrial wind generated ten percent of the nation's electricity, it would not staunch the fossil fuel emissions thought to be involved in accelerating global warming, given our nation's increasing energy consumption and given that wind can only intermittently (about 30 percent of the time) address the electricity portion of the energy production problem—the minor portion.

Given that wind only produces electricity, given that we use so little oil for electricity production, and even if large numbers of wind turbines displaced the one percent of our electricity now powered by oil, the region would still be heavily dependent on coal and gas, power sources often described as "dirty"—and we would still be mightily dependent on foreign oil, contrary to what the wind industry claims.”

The claim that industrial wind energy facilities will reduce green house gas emissions was addressed in the National Academy of Sciences’ Committee on Environmental Impacts of Wind Energy Projects, National Research Council study “Environmental Impacts of Wind Energy Projects” summary concerning Co2, SO2 and NO2 emissions at dels.nas.edu/dels/rpt_briefs/wind_energy_final.pdf. The Committee concluded that “development of wind powered electricity generation using the current technology probably will not result in a significant reduction in the total emissions of these pollutants from the electricity sector in the mid-Atlantic region”.

The claim that industrial wind energy facilities will benefit electrical grid reliability is false. Industrial wind turbines have variable power outputs. The amount of power generated at any moment in time is determined by the wind speed at that particular moment. In addition, industrial wind turbines produce electricity only when the wind is blowing within the right speed range. Today’s models may begin producing some electricity at wind speeds of about 8 miles per hour, reach rated capacity around 33 MPH, and cut out around 56 MPH. Because their output is intermittent, volatile and largely unpredictable, the electricity they produce has less value than electricity from reliable (“dispatchable”) generating units. Electricity grids must be kept in balance (supply & demand, voltage, frequency etc.), so one or more reliable, dispatchable generating units must be immediately available at all times to “back up” the unreliable wind generation. The reliable, backup units must ramp up and down to balance the output from the wind turbines. Wind turbines therefore detract from grid reliability and would be of no value in restoring an electric grid when there is a blackout. Wind turbines have virtually no “capacity” value.

We are considerably concerned with documented attempts to circumvent existing Federal and state laws through governmental mandates, failures to enforce those laws and blatant disregard of those laws by the industrial wind energy industry. The Forest Service has chosen to provide direction and guidance on wind energy development on National Forest System lands in its directives system: the Forest Service Handbook (FSH) and Manual (FSM). As with most directives guidance the policy for wind energy development is imbedded throughout a number of FSH and FSM chapters and is rather difficult for the average reader to follow. [See FSH 2709.11, FSM 2720, FSH 2709.11, Ch 40 and FSH 2609.13, Ch 80 for the new direction, which then leads to other handbook and manual chapters. We have found this most cumbersome in our analysis of the directives to determine the possible impacts on Pendleton County.

As a result of our analysis we have concluded that the proposed directives do not incorporate compliance with major Federal and State of West Virginia laws designed to protect the environment and citizens. Federal and State of West Virginia laws established for the protection of our “Commons” are circumvented, blatantly ignored and consciously broken by this industry and the federal and state agencies charged with enforcement thereof are ignoring their responsibilities. Therefore it is the responsibility of the Forest Service to insure compliance and to

involve those Federal and state agencies charged with their enforcement. Federal and State of West Virginia laws established for the protection of our “Commons” are circumvented, blatantly ignored and consciously broken by this industry and the federal and state agencies charged with enforcement thereof are ignoring their responsibilities. Federal and State of West Virginia laws established for the protection of our “Commons” are circumvented, blatantly ignored and consciously broken by this industry and the federal and state agencies charged with enforcement thereof are ignoring their responsibilities.

In 1973 Congress passed the Endangered Species Act to "provide a means whereby the ecosystems upon which endangered and threatened species depend may be conserved, and to provide a program for the conservation of these species." The United States Department of the Interior Fish and Wildlife Service is responsible for protection of terrestrial species, which form the majority of listed species. The Endangered Species Act prohibits both government agencies and private citizens from "taking" listed species, whether on public or private land. A "take" is any activity that kills or harms listed species or that destroys their habitat. In 1983 Congress adopted Section 10 of the Endangered Species Act as a way to promote "creative partnerships between the public and private sectors and among governmental agencies in the interest of species and habitat conservation." Section 10 authorizes states, local governments, and private landowners to apply for an Incidental Take Permit for otherwise lawful activities that may harm listed species or their habitats. To obtain a permit, an applicant must submit a Habitat Conservation Plan outlining what he or she will do to "minimize and mitigate" the impact of the permitted take on the listed species. The principle underlying the Section 10 exemption from the ESA is that some individuals of a species or portions of their habitat may be expendable over the short term, as long as enough protection is provided to ensure the long term recovery of the species. The proposed Forest Service Directives for Wind Energy fail to provide for consultation with Fish and Wildlife Service under the Endangered Species Act to assess the impact of industrial wind energy projects. This failure must be addressed and corrected.

Congress enacted the National Environmental Protection Act in December 1969 and it was signed into law on January 1, 1970. The National Environmental Protection Act was the first major environmental law enacted in the United States and is often called the “Magna Carta” of environmental laws. Most importantly, the National Environmental Protection Act established our national environmental policies. Because of the proposed location of industrial wind energy projects in the National Forests are likely to be significant, the National Environmental Protection Act will require the preparation and evaluation of an environmental impact statement to assess the impact and allows for public involvement in the process. Three government agencies are charged with overseeing the National Environmental Protection Act, the Council for Environmental Quality, the Environmental Protection Agency and the United States institute for Environmental Conflict Resolution. The proposed Forest Service Directives for Wind Energy fail to assess the impact of industrial wind energy projects under the National Environmental Protection Act. This failure must be addressed and corrected.

In 1782 the Continental Congress adopted the bald eagle as a national symbol. In 1940, to prevent the species from becoming extinct, Congress passed the Bald Eagle Protection Act. The Act was extremely comprehensive, prohibiting the take, possession, sale, purchase, barter, or offer to sell, purchase, or barter, export or import of the bald eagle at any time or in any manner. In 1962, Congress amended the Bald Eagle Protection Act to cover golden eagles, a move that was partially an attempt to strengthen protection of bald eagles, since the latter were often killed by people mistaking them for golden eagles. The golden eagle, however, is accorded somewhat lighter protection under the Act than the bald eagle. The proposed Forest Service Directives for Wind Energy fail to provide for consultation with Fish and Wildlife Service under the Bald Eagle Protection Act to assess the impact of industrial wind energy projects. This failure must be addressed and corrected.

The Migratory Bird Treaty Act, originally passed in 1918, implements the United States' commitment to four bilateral treaties, or conventions, for the protection of a shared migratory bird resource. The MBTA provides that it is unlawful to pursue, hunt, take, capture, kill, possess, sell, purchase, barter, import, export, or transport any migratory bird, or any part, nest, or egg or any such bird, unless authorized under a permit issued by the Secretary of the Interior. Some regulatory exceptions apply. Take is defined in regulations as: “pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect.” The Migratory Bird Treaty Act protects over 800 species of birds that occur in the United States. The proposed Forest Service

Directives for Wind Energy fail to provide for consultation with Fish and Wildlife Service under the Migratory Bird Treaty Act to assess the impact of industrial wind energy projects. This failure must be addressed and corrected.

The proposed Forest Service Directives for Wind Energy fail to consider the provisions and requirements of the National Forest Management Act, the Federal Land Policy and Management Act and the National Historic Preservation Act to assess the impact of industrial wind energy projects. This failure must be addressed and corrected.

Numerous government agencies have spent enormous amounts of time and money developing ways to protect, preserve, or rehabilitate watershed areas on a regional scale and must be taken into consideration by the Forest Service in any consideration to allow the siting of industrial wind energy projects in our national forests. Following is a list of projects to protect our environment.

“The United States Department of Agriculture and West Virginia are sponsoring a 25 million dollar Conservation Reserve Enhancement Program for the period from 2005 to 2010 to protect water quality and wildlife in selected watersheds in the state, including much of the Potomac River Basin. Representatives from the following helped produce The West Virginia Potomac Tributary Strategy Implementation Plan: West Virginia Department of Environmental Protection, West Virginia Conservation Agency, West Virginia Department of Agriculture, Cacapon Institute, and The Conservation Fund–Freshwater Institute (http://www.wvdep.org/Docs/9654_Implementation%20Plan%2012_15_05.pdf).

In 2002, West Virginia became a Headwaters Partner in the Chesapeake Bay Program upon the signing of the Chesapeake Bay Program Water Quality Initiative memorandum of understanding. In 2005, the “West Virginia’s Potomac Tributary Strategy”, developed by the West Virginia Tributary Strategy Stakeholders Working Group in cooperation with the West Virginia Department of Environmental Protection, the West Virginia Conservation Agency, and the West Virginia Department of Agriculture, was presented to the Chesapeake Bay Program (http://www.wvdep.org/Docs/9657_WV_Potomac_Tributary_Strategy_FINAL%20from%20web.pdf). This document points out that “The problems facing the Chesapeake Bay may seem remote to the concerns of West Virginians, but the quality of the waters that flow out of our state play an important part in determining the health of the Bay”.

One provision of the Watershed Protection and Flood Prevention Act, enacted in 1954 as Public Law 83-566 (<http://www.nrcs.usda.gov/programs/watershed/pl56631705.pdf>), was for conservation and proper utilization of land. This act encompasses over 1,500 active or completed watershed projects. In 1992, the Natural Water Resources Council of the U.S.D.A. published a National Watershed Manual (<http://www.nrcs.usda.gov/programs/watershed/NWSM.html>). The Flood Prevention Act of 1944 (Public Law 78-534; <http://www.nrcs.usda.gov/programs/watershed/pl534.html>) was also developed for the conservation and proper utilization of land, including the Potomac River Basin in West Virginia.

In 1997, the U.S. Environmental Protection Agency published the approximately 200-page “Volunteer Stream Monitoring: A Methods Manual” (<http://www.epa.gov/volunteer/stream/>), which emphasizes that watersheds are important because if natural land becomes impervious:

- “Less precipitation is evaporated back to the atmosphere. (Water is transported rapidly away via storm drains and is not allowed to stand in pools.)
- Less precipitation is transpired back to the atmosphere from plants. (Natural vegetation is replaced by buildings, pavement, etc.)
- Less precipitation percolates through the soil to become ground water. (This can result in a lower water table and can affect base flow.)
- More surface runoff is generated and transported to streams. (Stream flow becomes more intense during and immediately after storms.)”

The U.S. Forest Service, in its publication “Wildland Waters”, repeatedly emphasizes the importance of watershed protection of headwaters for sustaining water supply and water quality (http://www.fs.fed.us/wildlandwaters/newsletters/wildlandwaters_sp02.txt).

Section 305(b) of the Clean Water Act requires states to report to the U.S. Environmental Protection Agency on the designated uses of their waters, the extent of the impairment of those uses, and the causes and sources of impairment.

Deforestation of ridges where wind turbines are placed results in stormwater drainage not only to streams but also to interconnecting underground conduits, especially caves in karst areas where the bedrock consists of limestone. Where stormwater is drained away from the headwater areas on ridges, there is a decrease in groundwater recharge. Increased stormwater flow to streams causes greater flooding potential. Both the decrease in groundwater recharge and the increase in stormwater flow to caves changes the cave environment. The West Virginia Cave Protection Act WVC 20-7A-2 states that it is unlawful to “disturb or alter in any manner the natural condition of any cave” (<http://www.legis.state.wv.us/WVCODE/20/masterfrmFrm.htm>).

The Government Accountability Office (GAO) found, at the request of Congress, that “no one is considering the impacts of wind power on a regional or ‘ecosystem’ scale” and that state and local officials have no guidelines for considering the negative environmental impacts caused by huge wind turbines (The Inter-Mountain, Elkins, WV September 20, 2005; see also www.gao.gov/hew.items/d05906.pdf). The GAO learned that the wind turbine farm at Altamont Pass in California kills an estimated 1,700 to 4,700 birds a year, including between 880 and 1,300 federally protected raptors such as burrowing owls, red-tailed hawks, and golden eagles. The GAO has urged the U.S. Fish and Wildlife Service to work with state and local officials to provide expertise. A study by Bat Conservation International at the Mountaineer wind turbine farm in Tucker and Preston counties, WV, found that an estimated 1364 – 1980 bats were killed by the wind turbines during 6 weeks (www.batcon.org/wind/BWEC2004Reportssummar.pdf).

The proposed Forest Service Directives for Wind Energy fail to involve the various state agencies in assessing the impact of industrial wind energy projects. In fact, under the “Civil Justice Reform” section the Forest Service has determined that “After adoption of the proposed directives, (1) all State and local laws and regulations that conflict with the proposed directives or that impede their full implementation would be preempted”. Numerous state laws, regulations, procedures and projects have been enacted or implemented in states for the protection of the environment and citizens within the state and should be given full consideration in Forest Service decisions to allow siting of industrial wind energy projects in the National Forests within a states boundaries. This failure must be addressed and corrected.

Under the “Regulatory Impact” section the Forest Service states “Moreover, the proposed directives have been considered in light of the Regulatory Flexibility Act (5 U.S.C. 602 et seq.). It has been determined that the proposed directives would not have a significant economic impact on a substantial number of small entities as defined by the act because the proposed directives would not impose record-keeping requirements on them; would not affect their competitive position in relation to large entities; and would not affect their cash flow, liquidity, or ability to remain in the market. The proposed directives would have no direct effect on small businesses. The proposed directives merely clarify existing requirements that apply to processing special use proposals and applications and issuing permits for wind energy uses”. Thousands of businesses have located in close proximity to our National Forests because the millions of visitors to and users of the national forests provide a significant customer base. Tourism by any measure is a critical contributor to the economies and supports substantial employment in all states of the mid-Atlantic region. “Visit Scotland” published a 190 page report which included a well-conducted survey that indicated that tourists were less than enthusiastic about industrial wind turbines than was expected. Four out of five tourists indicated that they came to Scotland for the beautiful scenery and almost all stated that they valued the opportunity to see unspoiled nature. More than half agreed that the industrial wind turbines spoiled the look of the countryside. Over 25 percent stated that they would avoid those parts of the countryside with an industrial wind energy project. We have concluded from this and other reports, studies and discussions with tourism experts that industrial wind energy projects located on the pristine ridge tops and visible for miles will have a significant negative impact on tourist related businesses and related employment throughout the mid-Atlantic Region including our National Forests and that the Forest Service must consider that impact when considering siting an industrial wind energy project within a national forest.

We are very concerned that the Forest Service has chosen to provide this direction in its directives system: the Forest Service Handbook and Manual. The new directives are located in Forest Service Handbook 2709.11, Forest Service Handbook 2720, Forest Service Handbook 2709.11, Chapter 40 and Forest Service Handbook 2609.13, Chapter 80, which then leads to other handbook and manual chapters. As with most directives guidance the policy for wind energy development is imbedded throughout a number of Forest Service Handbook and Forest Service Manual chapters and is extremely difficult, if not impossible, for the average reader to follow. In addition, we have concluded that it gives too much discretion to local Forest Service personnel without mandating their involvement with the various governmental agencies as listed above.

Proposed Forest Service Handbook 2609.13, Chapter 80, ``Wildlife Monitoring at Wind Energy Sites is an example of our concern. We have determined that it gives too much discretion to both the local Forest Service personnel and the industrial wind energy project prospective permit holders. The industrial wind energy project in Tucker County, West Virginia is an example. Post construction monitoring of mortality rates were conducted at the site and the results showed the highest bat mortality rates in the world. As a result the project owner ceased all monitoring activities.

Again, Friends of Beautiful Pendleton County, Inc appreciates this opportunity to provide public comment of the proposed Forest Service Directives for Wind Energy. First we restate our conclusion that it is impossible to justify any Forest Service decision to permit the industrialization of one acre of the 193 million acres, including the pristine mountain tops in the pristine National Forests of Pendleton County, West Virginia, of the Commons placed under its management by "We the People" with industrial wind energy projects. We therefore respectfully request that our comments be given full consideration.

Respectively submitted,

A handwritten signature in cursive script that reads "Larry V. Thomas".

Larry V. Thomas, Vice President
Friends of Beautiful Pendleton County, Inc.