Enclosure to the U.S. Fish and Wildlife Service's letter of October 12, 2005

U.S. Fish and Wildlife Service
New York Field Office
Comments on our review of 2004 Avian Risk Assessment Report (ARA)
Chautauqua Wind Project (CWP)
Towns of Ripley and Westfield, Chautauqua County, New York
October 2005

Quotes from Pages 36-38 of 44 page report:

"We agree that there are serious consequences associated with burning fossil fuels to generate electricity, and we support energy policies which promote renewable sources, such as wind and solar, to provide alternate forms of electricity. However, construction of wind energy facilities will not reduce air pollution emissions at existing power generation facilities. Coal, oil, and nuclear generating facilities must be kept in operation and online to provide the main source of electricity, especially when the wind resources arc not turning the turbine blades. The intermittency of wind, coupled with the fact that the times of peak availability of wind resources in a given location may not coincide with the times of peak demand for electricity, makes wind energy less suitable from an energy standpoint.

"The ARA report provides a discussion of the environmental impacts associated with burning coal and oil to generate electricity (such as the nearby Dunkirk coal-fired generating facility). We agree that there are serious consequences of burning fossil, fuels to generate electricity. Increased levels of pollution prevention are needed at these facilities. Further, we support energy policies which promote renewable sources, such as wind and solar, to provide alternate forms of electricity. However, construction of wind energy facilities will not reduce air pollution emissions at existing power generation facilities.

"Likewise, adverse environmental impacts such as thermal water discharges, toxic effluents, or water consumption at existing facilities will not be abated by the construction of 34 wind turbines. This is simply due to the fact that coal, oil, and nuclear generating facilities must be kept in operation and online to provide the main source of electricity, especially when the wind is not turning the turbine blades. Due to the intermittent nature of wind-generated electricity, none of the existing coal, oil, or nuclear powered generation facilities will be shut down or run as reserve units. The intermittency of wind, coupled with the fact that the times of peak availability of wind resources in a given location may not coincide with the times of peak demand for electricity, makes wind energy less suitable from an energy standpoint.

"Importantly, any energy deficiencies that may occur in thy future in downstate New York will not be addressed by constructing a 50 Mw wind energy facility over 300 miles away in Chautauqua County.

"In upstate New York, the greatest wind resource is found during the winter and at night when demand is the lowest. Peak demand for electricity is during the summer months and during the day (NYLSO 2005a). We note that an excess supply of energy is expected to be available in New York State during the summer of 2005 with supply expected to exceed forecasted demand by 1,522 Mw. Generally, electricity deficiencies do not occur in upstate New York but may occur in the future in downstate areas, particularly New York City and on Long Island (expected surpluses for the summer of 2005 are 330 and 240 Mw respectively). Several State agencies are

working on addressing this situation through energy planning which includes provisions for constructing additional power plants in the areas that need it the most.

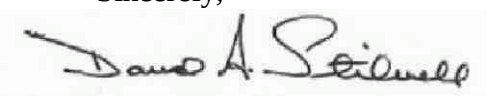
"New York State has pushed for reducing air pollution emissions at existing power plants such as the Dunkirk facility along with five other major pollution sources across the State. These plants account for approximately 60 percent of the power plant pollution in the State (Post Standard, January 12, 2005). An agreement has been reached to reduce emissions by 70 to 90 percent, chiefly sulfur dioxide and nitrogen oxide. Operating changes in these power plants will be more effective at reducing emissions that constructing thousands of wind turbines across the landscape.

"The nameplate capacity of the CWP is 50 Mw, which is roughly 8 percent of the capacity produced at the nearby 600 Mw Dunkirk generating station. However, the amount of electricity actually produced by this project will amount to a much smaller portion due to intermittent wind and equipment repairs. Typically, a wind energy project functions at approximately 30 percent of the nameplate capacity, or in the case of the CWP, a total of 35 Mw. By comparison, coal fired plants typically nm at 75 percent of capacity (DOE 2005). Therefore, the CWP will only generate 3 percent of the electricity produced at the Dunkirk facility. Combined, oil and coal are used to generate approximately 27 percent of New York's electricity.

"Overall, New York State has an installed generating capacity of 37,254 Mw, but the peak record demand stands at 30,983 Mw (NYISO 2005b). In addition, some electricity is imported into New York from nearby states due to lower generating costs and could push the total to over 41,000 Mw. While it is expected that a modest increase in electricity demand is expected in the future (approximately 1.5 %. per year), it appears that there will not be a critical shortage in supply which would necessitate the construction of the CWP. The overall contribution of the CWP's 50 Mw project (assuming 35 Mw of power is produced) to the State's current energy supply would be less than one tenth of one percent (0.00085). Likewise, the CWP would contribute only 1.5 percent of energy toward the goal of producing an additional 3,300 Mw of power from wind, as identified in the State's renewable portfolio standard.

"Construction is underway of four new generation facilities that will add approximately 2,000 Mw of power in the next 2 years. In addition, approximately 3,600 Mw of electricity at eight additional facilities have been approved for construction. One application is currently pending for review of a 1,100 Mw facility bringing the grand total to over 6,700 Mw of new generation sources for the State in the near future. However, we believe that energy efficiency and conservation are vital to reducing harmful emissions from power plants and impacts associated with electricity generation. New York State is making progress in energy conservation through its New York Energy Smart program which annually saved an average of 1,300 gigawatt-hours of electricity (NYSERDA 2005)."

Sincerely,



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