

Blue Mountains Conservancy

P.O. Box 666, La Grande, OR 97850

23 January 2011

Sue Oliver, Energy Siting Officer
Oregon Department of Energy
395 Highland Ave.
Hermiston, OR 97838

Dr. Karen Antell, PhD
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To Whom It May Concern,

I am writing in regards to the proposed construction of Horizon Wind's Antelope Ridge wind energy development site and my concerns about endangered species of plants within the development area. My most urgent concern is for the Jimmy Creek Meadows population of Oregon semaphore grass.

Oregon semaphore grass is a unique and surprising grass that occurs in two populations within the state of Oregon, and nowhere else in the world. This highly endemic species occurs only on private lands; there are no known locations on any public lands where they may be managed by state or federal agencies to insure preservation of the species for the future heritage of all Oregonians.

Because of its extreme rareness, Oregon semaphore grass has a global heritage rank of G1, and a state heritage rank of S1. This ranking is established for species that are "critically imperiled because of extreme rarity or because it is somehow especially vulnerable to extinction or extirpation, typically with 5 or fewer occurrences"¹. It is listed by the Oregon Department of Agriculture as Threatened, a taxon "likely to become endangered within the foreseeable future"¹. Its federal status is Species of Concern.

In its profile for Oregon semaphore grass, the Center for Plant Conservation explains that "although the range is so limited, the U.S. Fish and Wildlife Service removed this plant from candidate status in 1996 because the threats from grazing and stream channelization appeared minimal"². Construction of wind turbines, power lines, and access roads in the remote area of Jimmy Creek Meadows constitutes a threat that was not anticipated by the U.S. Fish and Wildlife Service.

Oregon semaphore grass is rare in part because it requires a very specific habitat that does not occur in many places, and because it does not have a high rate of seed production. It can, however, grow compatibly with traditional land uses, such as livestock grazing. It is resilient to moderate grazing during parts of the growing season, and the Jimmy Creek Meadows population has been sustained throughout ongoing land use practices of the land owner. However, construction of wind turbines in the Jimmy Creek Meadows area presents a significantly different set of challenges to long-term survival of the species.

Suggested mitigation measures for Oregon semaphore grass include 25 foot buffer zones around all plants, restricted access to Jimmy Creek Meadows during construction, and implementation of a weed control plan. These mitigation measures fall far short of insuring that the population will not be affected by other surrounding disturbances. One significant concern which has not been addressed by these mitigation measures is potential changes to the meadow hydrology that may result from surrounding road-building activities. Either an increase or decrease in water flow in the meadow could affect semaphore grass viability. Introduction of alien weed species would be a significant ongoing threat resulting from the large and continuing influx of motor vehicle traffic throughout the area during the life time of the facility. Unfortunately, having a weed management plan in place does not preclude the possibility of noxious weed introduction; some weeds simply are not easily manageable, especially when herbicide use may negatively impact co-existing native vegetation.

The State of Oregon has set clear standards for protection of threatened and endangered species in OAR 345-022-0070. The Energy Facility Siting Council may issue a site certificate only if activities "are not likely to cause a significant reduction in the likelihood of survival or recovery of the species"³. There is no clear evidence that the Jimmy Creek Meadows population of Oregon semaphore grass will survive the surrounding long-term disturbance that inevitably will result from wind turbine construction and operation around the meadow area. The extreme rarity of this species, and the lack of protection elsewhere, demand that the ODE set a high standard of protection for this endangered species to insure that the future heritage of all Oregonians is not diminished by the loss of this species.

When taken into consideration with the fact that other threatened plant species, such as Douglas Clover also would be impacted by this project, I strongly urge that the Oregon Department of Energy stop construction of wind turbines within the vicinity of Jimmy Creek Meadows.

I request that these comments be entered as a part of the public record.

Sincerely,



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1. Rare, Threatened and Endangered Species of Oregon, Oct. 2010; Oregon Biodiversity Information Center, Institute for Natural Resources, Portland State University.
 2. Center for Plant Conservation profile for Oregon semaphore grass:
(http://www.centerforplantconservation.org/collection/cpc_viewprofile.asp?CPCNum=3529)
 3. Oregon Administrative Rules, Dec. 2010, Oregon State Archives, Secretary of State, Salem, OR.