

Molly Joseph Ward  
Secretary of Natural Resources

Clyde E. Cristman  
Director



Joe Elton  
Deputy Director of Operations

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Deputy Director of Administration  
and Finance

**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

600 East Main Street, 24<sup>th</sup> Floor  
Richmond, Virginia 23219  
(804)786-6124

September 2, 2014

Hope Gray  
Service Information Collection Clearance Officer  
U.S. Fish and Wildlife Service  
MS 2042-PDM  
4401 North Fairfax Drive  
Arlington, VA 22203

Re: Proposed Information Collection; Land-based Wind Energy Guidelines "1018-0148"

Dear Ms. Gray:

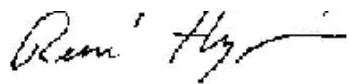
The Department of Conservation and Recreation's Division of Natural Heritage's (DCR) mission is conserving Virginia's biodiversity through inventory, protection, and stewardship. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal, unique or exemplary natural communities, and significant geologic formations.

DCR has reviewed the Land-Based Wind Energy Guidelines in reference to information collection and provides the following comments:

- Up-to-date data for the project area is a vital component of determining whether the project area is a suitable location for a wind energy project, potential impacts and mitigation options and cost. Dependent on whether previous information /survey work has been conducted for the project area determines the level of needed information or if the collection of information is necessary.
- The accuracy of the estimate of the burden for the collection of information listed in the table on page 38056 of the Federal Register is dependent on the size of the project, complexity of the issues, experience and equipment needs of the consultant as well as previous information available for the site.
- Established survey protocol used for collecting the data will enhance the quality, utility and clarity of the information.
- Initial use of on-line desktop tools such as the Natural Heritage Data Explorer in the Tier 1 phase of project development will help in determining the data available and guide needed survey work for the project area reducing potential costs.
- Ways to minimize the burden of the collection of information on respondents is to identify project locations with potential minimal impacts to rare, threatened and endangered (RTE) species based on existing information and development of guidelines/best management practices for candidate and existing RTE species that can be implemented to avoid and minimize impacts such as facility operations including higher cut in speeds.

Thank you for the opportunity to comment on this proposed Land-Based Wind Energy Guidelines: Information Collection.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Rene' Hypes", with a stylized flourish extending to the right.

S. Rene' Hypes  
Virginia Natural Heritage Project Review Coordinator