



June 29, 2009

Governor Jeremiah W. (Jay) Nixon  
Office of the Governor  
P.O. Box 720  
Jefferson City, Missouri 65102

**Re: Missouri Prairie Foundation Position on Wind Energy in Missouri**

Dear Governor Nixon,

As you are aware, wind power is a rapidly expanding energy industry in Missouri. The Missouri Prairie Foundation (MPF) supports necessary energy technologies to replace fossil fuels. The MPF board of directors is concerned, however, that wind and other alternative energy industries in Missouri could pose potential negative impacts to our native grasslands and wildlife, and calls for environmental oversight of them.

MPF, along with its Grasslands Coalition partners Quail Unlimited and the Conservation Federation of Missouri, call upon you and other elected officials, the Missouri Public Service Commission, and the wind energy industry operating in Missouri to work with MPF and other conservation groups to protect ecologically sensitive native grassland areas. **This can be achieved by ensuring that protection of grassland Conservation Opportunity Areas (COAs)<sup>1</sup>—identified as the best remaining strongholds for viable populations of prairie wildlife—be considered when siting wind energy facilities and infrastructure.**

As stated by Brian Obermeyer, Director of the Flint Hills Initiative for the Kansas Chapter of The Nature Conservancy, "The beauty of wind power is that, with proper siting, we *can* avoid most ecological impacts."

**>>Prairie Habitat Fragmentation:** According to Charles Pappas, planner with the Missouri Department of Natural Resources Energy Center, the trend among wind energy companies is to site at least 150 to 250 towers on at least 10,000 acres. We understand that a current project in northeastern Missouri may affect 60,000 acres. Because so little of Missouri's original prairie remains, MPF is especially concerned with **prairie habitat fragmentation** that could occur with wind power of this scale

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<sup>1</sup> In 2005, at the request of the U.S. Fish and Wildlife Service, the Missouri Department of Conservation and its conservation partners designated Conservation Opportunity Areas (COAs) as the best places in the state that meet the needs of wildlife, to prevent the federal listing of any more plants or animals as threatened or endangered. There are nine COAs in Missouri that include native grasslands.

within any of Missouri's nine grassland COAs, and **most immediately in the Mystic Plains, Grand River Grasslands and Loess Hills Conservation Opportunity Areas in northern Missouri (see enclosures).**

**>>Wind Energy Regulations and Proposition C (Missouri Clean Energy Initiative/Renewable Portfolio Standard for Investor-Owned Utilities)**

There are currently no state or federal regulations guiding wind power siting requirements in Missouri on private land.

Missouri's Renewable Portfolio Standard for Investor-Owned Utilities (RPS) calls for energy utilities regulated by the Missouri Public Service Commission to generate or purchase an increasing percentage of their energy from renewable sources. MPF understands that the Department of Natural Resources and the Missouri Public Service Commission are currently writing separate rules that address their areas of responsibility in regard to RPS.

RPS language includes the following: "Certification criteria for renewable energy generation shall be determined by factors that include fuel type, technology, and the environmental impacts of the generating facility. Renewable energy facilities shall not cause undue adverse air, water, or land use impacts, including impacts associated with the gathering of generation feedstocks." **MPF urges the Missouri Public Service Commission to include impacts to native grasslands and their associated wildlife in the above certification criteria.**

**>>MPF Seeks Conservation Collaboration with Wind Energy**

We understand that there are currently three companies with wind energy facilities in Missouri: Wind Capital, Trade Winds Energy and Iberdrola.

There are no incentives in place in Missouri to encourage wind power companies to site facilities in areas that will have minimal impacts to wildlife. Kansas City Power and Light and wind energy companies in other states, however, such as West Star Energy, are listening to concerns of conservation groups and are working hard to site their facilities to avoid impacts to ecologically sensitive areas.

**MPF requests this kind of collaboration in Missouri.** MPF calls for the proper siting of facilities for minimal impacts to native grasslands. MPF is eager to meet with wind power representatives and assist them with siting strategies that will protect our remaining prairie heritage in Missouri for future generations.

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## **Background Information**

### **>>Background on Wind Energy and Fragmentation of Native Grasslands**

Published research has documented the displacement effects of human intrusions on prairie-chickens and other ground-nesting grassland birds. While the actual footprint of a wind turbine is not large, the overall area required for a wind facility, including transmission lines and road infrastructure, is extensive. Assuming a 64-acre project footprint per megawatt of installed wind energy capacity, a 200-megawatt wind farm would require over 12,800 acres; this estimate is based on the turbine spacing of four wind projects in Kansas (Brian Obermeyer, The Nature Conservancy, pers. comm.). Some biologists have estimated that nesting and brood-rearing prairie-chickens may abandon otherwise suitable habitat by more than one mile of a utility-scale wind turbine.

MPF encourages active investigation of methods of generating and transmitting wind power with a footprint that is less intrusive on open space than large-scale wind farms, such as policies like feed-in tariffs. Feed-in tariffs are proving successful in countries such as Germany, France and Spain. California is currently considering the expansion of its feed-in tariff policy and several other states are currently considering legislation to implement it. Feed-in tariffs provide incentives for homeowners, businesses and industries to install these renewable energy features.

### **>>Background on the Missouri Prairie Foundation (MPF)**

- In 1966, a group of citizens with an interest in conserving Missouri's prairie heritage formed MPF. Its mission is to protect and restore prairie and other native grassland communities through acquisition, management, education and research. MPF is governed by a volunteer board of directors. MPF members and supporters live throughout the state and country, and outside the U.S.
- For 43 years, this nonpartisan, nonprofit organization has advocated for prairie conservation. It has encouraged acquisition and protection of prairie by state agencies, and also owns and manages 14 tracts of prairie. MPF assists private landowners with prairie conservation, and encourages strategies for both prairie conservation and economic development, including prairie biomass energy. (See enclosed article from the *Missouri Prairie Journal*.)
- In 1998, MPF spearheaded the formation of the Grasslands Coalition—20 nonprofit organizations, state and federal agencies and other groups with a common interest in protecting native grasslands. The Grasslands Coalition pools knowledge and resources to maximize positive impacts on prairie conservation.

### **>>Background on Missouri Prairie**

- At least 15 million acres of Missouri, covering more than a third of the state, were prairie at the time of European settlement. Fewer than 90,000 acres remain.
- Prairie is home to more than 800 native plants, thousands of native pollinators and other insects and invertebrates, and a diversity of vertebrate animals.
- Prairie plant roots, some growing as deep as 15 feet, sequester carbon, build rich soil, help with groundwater recharge and protect streams.
- Meat from cattle and bison raised on native tallgrass prairie is nutritious and delicious. Grazing by these animals provides excellent vegetation structure for wildlife. Cattle on prairie help cattle producers afford to keep prairie as prairie.
- Many plants that are hardy and water-efficient for our home and corporate landscaping are native to Missouri's prairies. Our prairies are genetic reservoirs that can provide us with future resources to improve our lives.

Enclosures: • Article from Vol. 28, #4 (2007) *Missouri Prairie Journal*, "The Missouri Prairie Foundation: Supporting Conservation and Economic Opportunities in Missouri's Native Grasslands"  
• Profiles of the Loess Hills, Mystic Plains and Grand River Grasslands Conservation Opportunity Areas

c: Mr. Robert M. Clayton III, Chairman, Missouri Public Service Commission  
Missouri Conservation Commissioner William F. "Chip" McGeehan  
Missouri Conservation Commissioner Lowell Mohler  
Missouri Conservation Commissioner Don Johnson  
Missouri Conservation Commissioner Becky L. Plattner  
Mr. John Hoskins, Director, Missouri Department of Conservation  
Mr. Mark N. Templeton, Director, Missouri Department of Natural Resources  
Mr. Tom Carnahan, President, Wind Capital  
Mr. Robert H. Freeman, Chief Executive Officer, Trade Winds Energy, LLC  
Mr. Ralph Curry, President and CEO, Iberdrola, North American Headquarters  
Mr. Irl L. Scissors, Executive Director, Missourians for a Balanced Energy Future  
Ms. Elizabeth Danforth, Kansas City Power and Light  
Ms. Anita Randolph, Director, Missouri Department of Natural Resources Energy Center  
Mr. Donald Furman, President, American Wind Energy Association  
Ms. Lori Jodziewicz, American Wind Energy Association  
Mr. Paul L. Sadler, Executive Director, The Wind Coalition  
Ms. Beth Soholt, Director, Wind on the Wires  
Ms. Ginger Harris, Chair, Missouri Chapter of the Sierra Club  
Ms. Linda Tossing, Chair, Missouri Bird Conservation Initiative  
Mr. Glenn Chambers, President, Conservation Federation of Missouri  
Mr. Nick Prough, Great Plains Regional Director, Quail Unlimited  
✓Mr. Mike Taylor, Engineer, Missouri Public Service Commission  
Ms. Brenda Wilbers, Energy Policy and Analysis Manager Missouri Department of Natural Resources Energy Center  
Mr. Charlie Pappas, Planner III, Missouri Department of Natural Resources Energy Center



# The Missouri Prairie

## *Supporting Conservation and Economic Opportunities in Missouri's Native Grasslands*

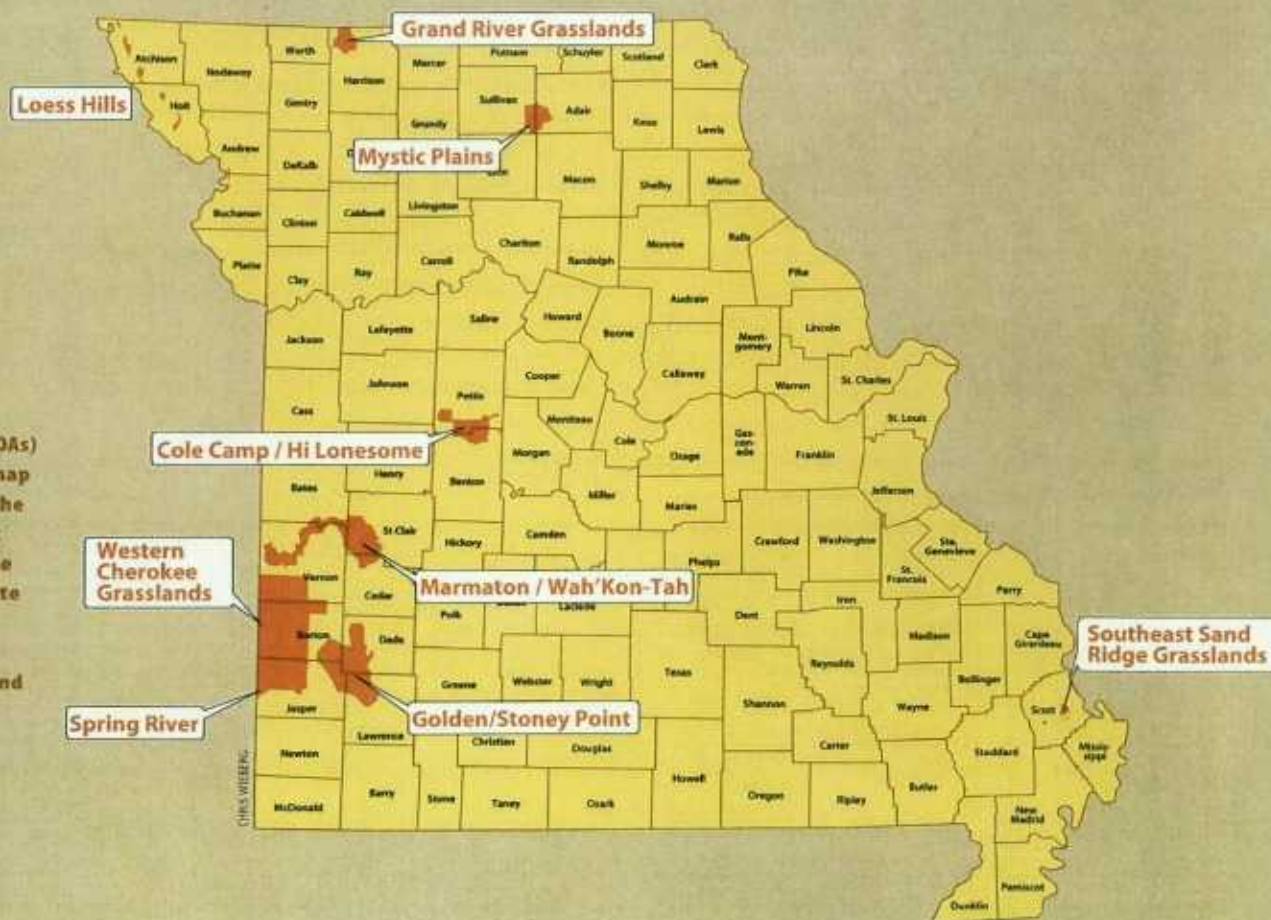
By Carol Davitt

In 1966, a group of citizens with an interest in conserving Missouri's prairie heritage formed the Missouri Prairie Foundation (MPF). MPF is governed by a volunteer board of directors, who are biologists, birdwatchers, educators, business owners, cattle ranchers and hunters. For 41 years, this nonpartisan, nonprofit organization has advocated for prairie conservation.

This advocacy has taken many forms. In some cases, and as funds are available, MPF purchases remaining prairie tracts from willing landowners. One of these is Golden Prairie in Barton County, which was acquired in 1970 from a family that always wanted the land to remain as prairie. In 1975, the National Park Service designated Golden Prairie a National Natural Landmark. A map of all MPF-owned prairies is on page 32. In other cases, MPF encourages state agencies to buy and manage native prairie from willing landowners. MPF's involvement was key to the acquisition and development of the Department of Natural Resource's Prairie State Park, now recognizing its 25th anniversary, and to the purchase of numerous prairies throughout the state by the Missouri Department of Conservation (MDC).

In recent years, MPF has recognized that the best way to conserve prairie heritage for future generations is to develop strong partnerships with other like-minded organizations, as well as with private landowners with economic and recreational interests in their land. In 1998, MPF spearheaded

The Grassland Conservation Opportunity Areas (COAs) highlighted on this map were designated by the Missouri Department of Conservation as the best places in the state to conserve prairie wildlife. These areas include both public and private high quality prairie and privately held working lands.





# Foundation

the formation of the Grasslands Coalition (GC). GC partners—Quail Unlimited, the Society for Range Management, state agencies, Audubon Missouri, The Nature Conservancy, and many other groups—pool resources and expertise to maximize positive impacts on prairie conservation.

One of the GC's first steps was to identify core areas of the state that were strongholds for state-endangered greater prairie-chickens and the best places to invest limited resources to protect and restore grassland habitat. These areas, called Grasslands Coalition Focus Areas, contain public land owned by the Missouri Department of Conservation, the Department of Natural Resources, MPF, The Nature Conservancy and land owned by private citizens maintained as native prairie, pasture or cropland.

*The Grasslands Coalition has always appreciated how important cropland and well managed pasture are to the future of grassland wildlife. Together with species-rich prairie, working lands are a critically important part of the habitat matrix that can support grassland birds and other prairie-adapted species.*

The GC has always appreciated how important cropland and well managed pasture are to the future of grassland wildlife. Together with species-rich prairie, working lands are a critically important part of the habitat matrix that can support grassland birds and other prairie-adapted species. The GC also recognizes the economic realities that come with making a living from the land and wants to work with landowners to improve habitats in mutually beneficial ways.

The GC has secured millions of dollars of funding for prairie restoration, control of invasive species and acquisition of land for prairie wildlife. This funding has been used on public land and also given to private landowners interested in improving prairie habitat on (or selling) their land. A summary of accomplishments of the GC for greater prairie-chicken recovery efforts in fiscal year 2007 is on page 26.

In 2005, MDC was called upon by the U.S. Fish and Wildlife Service to identify the best places in the state that meet the needs of wildlife, to prevent the federal listing of any more plants or animals as threatened or endangered. As part of this Comprehensive Wildlife Strategy, MDC designated Grassland Conservation Opportunity Areas as the best places in the state to conserve prairie wildlife—these COAs include or are associated with Grasslands Coalition Focus Areas.

Today, MPF is exploring additional ways to help both private landowners making a living off of their land and prairie wildlife. The articles on the carbon market and the Show Me Energy Cooperative that follow in this issue, and articles in the same vein that will appear in future issues, explore what could be coined the Tallgrass Prairie Economy—economic opportunities available from high quality grasslands to people living in them.

Carol Davit is the *Journal* editor.



WALTER SCHMIDT

**At the time of European settlement, at least 15 million acres—more than one-third—of Missouri's landscape was tallgrass prairie (see orange, above). Fewer than 90,000 acres of tallgrass prairie remain today. More than 800 different kinds of plants can be found on Missouri's prairies, which also support countless species of birds, insects, mammals and other wildlife. Healthy native grasslands may hold promise for our own economic benefit as well.**



FRANK GRELL