AOK Official Position on **Wind Turbine Siting**

AOK supports the following guidelines and practices for siting and operating wind energy generation in Kansas:

1. Proper siting of wind turbines :
   - –Use available data from state and federal agencies and other sources showing location of sensitive resources and landscape-scale screening of possible project sites
   - –Avoid siting on intact ecosystems, such as undisturbed prairie and wetland habitat
   - –Avoid siting in migration corridors, especially those used by endangered and threatened species, or within three miles of state and federal parks and refuges, state wildlife areas, and other protected areas
   - –Avoid siting within three miles of known prairie grouse leks and nesting areas
   - –Avoid siting that fragments contiguous habitat
   - –Avoid siting between roosting and feeding or resting areas of birds or bats
   - –Follow siting *Guidelines for Windpower Projects in Kansas* of the KDWPT and the USFWS Best Practices
   - –Consider cumulative impacts of new sites in relation to existing siting within flyways and with regard to impact on crucial habitat on a regional basis

   Observance of these stipulations requires thorough preliminary screening of potential sites, and careful examination of local conditions and wildlife presence and habits.

2. If preliminary studies of the potential site by KDWPT or USFWS staff and other qualified professionals indicate unacceptable impacts on wildlife and habitat, the site should be rejected; in cases where impacts are expected, but not sufficiently great as to cause abandonment of the site, plans should be devised to minimize impacts discerned in preliminary studies, and to mitigate or compensate for significant impacts.

3. Avoidance of siting on native prairie and crucial habitat is always to be preferred over compensatory offsite mitigation.

4. Having done preliminary studies of the hydrology and geology of the chosen site, and having inventoried the wildlife and flora, disruption of these physical conditions and biota should be minimized to the extent possible during construction.

5. Report results of studies to KDWPT and USFWS prior to construction, and at regular intervals during operation.

6. Conform to USFWS guidelines for placement of above-ground electrical wires, transformers, and other structures attendant to the wind turbines themselves.

7. Keep lighting at both operation and maintenance facilities and substations located within half a mile of the turbines to the minimum required; lights not essential for safety practices should be hooded and directed downward to minimize skyward illumination.

8. Establish non-disturbance buffer zones to protect sensitive habitats or areas of high risk for species of concern reported in pre-construction studies; determine extent of buffer zones in consultation with USFWS, KDWPT, local and tribal biologists, and land management agencies (e.g., BLM, USFS) or other credible experts as appropriate.

9. When construction is completed, restore the site as far as possible to its original condition, using native plants; minimize impacts to wetlands and water resources.

10. Conduct follow-up studies to confirm preliminary estimates of impact and report them to KDWPT and USFWS in order to make adjustments to minimize or mitigate unanticipated negative consequences, utilizing guidance from credible experts.

11. Monitor for invasive species; use locally approved invasive species prevention and control measures to control or eradicate.

12. When the turbines are retired, remove all evidence of their presence, restoring the soil and flora, using topsoil set aside in construction and native seeds and plants.

13. Overall, in all planning and operations, observe enforcement of existing laws.