

# Grande Prairie Wind Farm - Comments Received on the Draft EIS and Responses

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On June 20, 2014, the U.S. Environmental Protection Agency (EPA) published a Notice of Availability (NOA) in the Federal Register and requesting comments on a Draft Environmental Impact Statement (DEIS) as part of an application to interconnect the proposed Grande Prairie Wind Farm to Western's 345-kilovolt (kV) Fort Thompson to Grand Island transmission line at a new switchyard. Publication of the NOA initiated a 45-day comment period. Western received comments via phone, e-mail, PDF attachments, written comments, as well as during a public hearing held in O'Neill, Nebraska on July 1, 2014. The public comment period ended on August 4, 2014. This document includes all comments received and Western's responses to each.

The document is organized into two sections: Section 1 includes a table of the comments received and related information (commenter name, organization if applicable and itemized comment numbers and related comments). Section 1 is organized numerically according to comment number. Section 2 includes copies of individual comments arranged by comment number.

Since release of the DEIS, the following substantive changes have been made to the EIS:

- The turbine layout has been updated on all applicable figures; noise and shadow flicker analyses have been re-run with the new layout (see Sections 4.11.1 and 4.12.1).
- Temporary and permanent disturbance calculations have been updated; see Table 4.2-1 for more details
- Results of the 2014 surveys have been included and impacts to these resources have been updated, including:
  - American Burying Beetle (see Sections 3.8.2.1 and 4.8.1.5)
  - Northern long-eared bat (see Sections 3.8.2.1 and 4.8.1.6)
  - Wetlands (see Sections 3.6.2 and 4.6.1)
  - Cultural Resources (see Sections 3.9.2 and 4.9.1)
  - Orchids (see Sections 3.8.2, 3.8.2.2, 4.8.1.7 and 4.8.1.8)
  - Bald Eagles (see Sections 3.7.2.6 and 4.7.1.4)
- Additional Avoidance, Minimization and Mitigation Measures have been added to Sections 4.8.1.9 and 4.7.1.5
- The following supporting documents have been updated since the DEIS. The updated versions are available at <http://www.wapa.gov/ugp/Environment/GrandePrairie.htm>.
  - Wildlife Conservation Strategy (formerly the Bird and Bat Conservation Strategy)
  - Northern Long-Eared Bat Conservation Measures
  - Viewshed Analysis
- The following supporting documents have been added since the DEIS. These documents are available at <http://www.wapa.gov/ugp/Environment/GrandePrairie.htm>.
  - Public Scoping Period Comments
  - Northern long-eared Bat Phase 1 Habitat Assessment (West Inc., 30 July 2014)
  - Aerial Nest Survey Results for the Grande Prairie Wind Farm (West Inc., 30 July 2014)
  - American Burying Beetle Survey (West Inc. and Hoback Consulting, 30 July 2014)
  - Northern long-eared Bat Acoustic Monitoring (West Inc., 7 August 2014)
  - Orchid Survey Results Memo (TetraTech, 29 September 2014)
  - Wetland Delineation and Jurisdictional Waters Survey (TetraTech, December 2014)
  - Bald Eagle Nest Monitoring Results at the Grande Prairie Wind Farm (West Inc., 12 September 2014)
  - USFWS Consultation and Conferencing Letter (5 November 2014)

Specific responses to public comments and associated revisions are addressed in Section 1 of this document.

**Section 1: Comments received on the DEIS with responses and related information (commenter name, organization [if applicable], itemized comment number, related comments, and Western's response to each).**

Comment Number	Commenter	Format	Page	Comment	Response
1	Rod Thomas	Phone	1 of 1	Rod's comment is that he is very supportive of the wind project and hopes the project goes well. He is very supportive of renewable energy projects.	Thank you for your comment.
2	Earl Miller	Letter	1 of 1	I am in favor of this project to move forward as it will furnish people with clean energy.	Thank you for your comment.
3	Lori Storm	Public Hearing Oral Comment	13 of 25	According to the U.S. Energy Information Administration, the cost of wind subsidies are still up at \$52.48 per one million megawatt hours generated. Now, contrast that with the amount of electricity from coal, or -- yeah, from coal, is 64 cents, natural gas 63 cents, and hydropower is 84 cents. So it is still 52 times more subsidized than any other form of energy in the country, which means any lease you pay our power to generate, basically paid for by the American taxpayer and not by the energy you generate. I guess I have a problem with that.	Thank you for your comment.
4	Lori Storm	Public Hearing Oral Comment	14 of 25	The cost to taxpayers is only part of the problem. That wind energy subsidy is allowing wind energy to literally force itself on the market. In many areas in the Midwest and in Texas, wind energy companies are paying power companies to use their energy, which then displaces other forms of energy we can create for 150th of the cost, which I have a serious problem with interrupting Avista for wind energy that's paid for by the taxpayers. We could all sit on our exercise bikes once a day and generate energy and it will cost us less money.	Thank you for your comment.
5	Lori Storm	Public Hearing Oral Comment	14 of 25	It's still far less economically feasible. In fact, Steven Chu, who is the energy secretary who likes wind energy, has recently admitted in a paper that wind energy is a mature technology, but costs 12 times more today to produce than it did in 1994 when we started the subsidies. The entire issue of the subsidies was to put wind energy on the market and make it viable so that technology could make it cheaper. We've made it 12 times more expensive by putting it on the government door.	Thank you for your comment.
6	Lori Storm	Public Hearing Oral Comment	15 of 25	The other issue is it piqued demand energy. Chicago gets 30 percent of its power from wind energy these days, and in 2009 they had -- what was it, 92 days where they got zero energy, and 236 other days that -- the point was at the end of the year, the wind generators had a 99.8 percent failure rate at providing them the necessary power, even simply based on the contract of the 28 percent of the power it was supposed to provide. It didn't do that 99.8 percent of the time.	Thank you for your comment.
7	Lori Storm	Public Hearing Oral Comment	15 of 25	The other issue is you're doing an environmental impact study on the environmental impact to the U.S., but the 800 pounds of rare earth minerals that will go into each of those turbines, 95 percent of which are mined in China, which has no environmental laws, and a recent paper by MIT has proven that for every pound of radioactive -- or of rare earth mineral China mines, they create a pound of radioactive acidic waste, which means that last year in this country, the wind energy sector produced more radioactive waste on the globe than the nuclear energy sector did.	Thank you for your comment.
8	Lori Storm	Public Hearing Oral Comment	16 of 25	And it's not being stored in secure, safe facilities like the U.S. nuclear waste is, it's being dumped in a lake in China. Those are my comments.	Thank you for your comment.

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9	Barb Otto	Public Hearing Oral Comment	16 of 25	You know, we get all hung up on these environmental sites and impact statements and the endless environmental drain thing that's being shoved down our throat constantly. Why is it that it's a \$10,000 fine to kill a bald eagle, but if we find a turbine -- or a wind generator and chop them into a thousand pieces, I -- I always so question all the importance of these environmental hang-ups that the government seems to have as long as it's convenient for their purposes. Thank you.	Eagles are protected under the Bald and Golden Eagle Protection Act. No activities are exempt; however, incidental take may be permitted under the Eagle Permit Rule (see Section 1.5.1).
10	Amy Shane	Public Hearing Oral Comment	17 of 25	And I just wanted to point out that the -- the taxpayers will have some tax relief based on taxes generated through the nameplate tax, and that would certainly be welcome property tax relief in this area. So that is a positive in relation to this project.	Thank you for your comment.
11	Lori Storm	Public Hearing Oral Comment	17 of 25	We have several counties in Nebraska that have put up wind generators, and the average savings for property taxpayers versus the federal and state and local subsidies paid to the windmills equals a negative rate for taxpayers of over 70 percent in each and every case. The numbers are there. All you have to do is the math. So there isn't going to be any real property tax relief for the majority of citizens, only for a select few; and even then, when they factor in the state and local and federal taxes they pay to the subsidies, there is no savings. There's still no water.	Thank you for your comment.
12	Mike Zakrczewski	Public Hearing Oral Comment	18 of 25	I'm a landowner within the project area, and we have a substantial representation of fellow landowners here who would like to express our full support for the project. We feel that it is very environmentally friendly; we feel that it is a cost-effective source of energy, and obviously OPPD agreed with that assessment. And if I could, could I just get a show of hands of fellow landowners who do support the project. (Indicating.) We have also encountered overwhelming support from the community at large for this project. And so that's my comment.	Thank you for your comment.
13	Boyd Strobe	Public Hearing Oral Comment	21 of 25	...I have no problem with the environmental impact of this project. And I think we have many community leaders here, too, and if they wished, by show of hands, they do not have any objection to the environmental aspect of this coming into the community; and all the community leaders that support it, if I could, please. (Indicating.) I think we had landowners before, but I wanted to see if there was community support also. Thank you.	Thank you for your comment.
14	Marv Fritz	Public Hearing Oral Comment	22 of 25	I'm not going to sound very organized because I haven't done a lot of work on this for a couple of years, but most of -- the numbers that the lady gave before, that's way out of what -- whack of what I've heard. If the cost is 4, 5 or 6 cents, most of the other generations that our other greenhouses' -- for the company that I now work for -- electricity is 7, 8, 9, 10 cents a kilowatt hour, and the wind turbines don't need any subsidy to make it work very well under that set of circumstances, but --And the government has decided that for whatever reason -- I don't think anybody's arguing that there's climate change, it just amazes me that we think we can do something about it. But nevertheless, they think they can, so they're going to make our electricity -- which we're used to dirt cheap stuff in Nebraska -- a lot more expensive. So even if they're not maybe able to operate with as cheap as the old coal that we have now, it won't be very much longer, the way things are going, and they should be able to operate without subsidies.	Thank you for your comment.

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15	Marv Fritz	Public Hearing Oral Comment	22 of 25	And as someone that's put my whole life and everything that I've ever done in my life invested into this community, it's -- I've said this before. I mean, it's not 1950, it's never going to be 1950. Not everything is going to work, but we've got to keep trying things and doing good things or we get stagnant. We were the -- we had the dubious distinction of losing more population than any county in the state of Nebraska when I moved to this community 12 years ago. I think we've -- Nikki can correct me, I guess, but I think we've at least arrested that, and it's projects like this that are going to help us turn around and push that back another direction. Thank you.	Thank you for your comment.
16	Nicole Sedlacek (Holt County Economic Development Agency)	e-mail	1 of 1	I would like to have my comments on the record for the Interconnection of the Grande Prairie Wind Farm project in Holt County, Nebraska. Holt County Economic Development Agency has no issues at all with the environmental impact statement regarding this proposed project. HCED believes this project has the potential to be a huge game changer for rural Nebraska in regards to the positive economic impact a project this size could have on our county and absolutely no negative impact, environmentally.	Thank you for your comment.
17	Dennis Sanne (CORE Development Inc)	Written	1 of 1	We are a 6 town development organization with 3 towns located in Holt Co. Our organization supports this wind farm project as we recognize the economic impact it can have on our rural community. We recognize there may be a minor environmental impact, but it is impossible not to affect the environment in some way with anything man does.	Thank you for your comment.
18	Bruce Cole	Written	1 of 1	I am in favor of the Grande Prairie wind farm. I am asking that you will do your part in helping this project happen. Thank you!	Thank you for your comment.
19	Claude and Gladys Cole	Written	1 of 1	We are in favor of this wind farm and find no problems with any towers. This is an open country and we have plenty of wind and feel it s a clean source of energy. Wind is something we use but do not USE IT UP.	Thank you for your comment.
20	Joe Summerlin (Environmental Protection Agency)	PDF	1 of 2	EPA agrees with Western's assessment that wind power has enormous benefits for the human environment, and we want to see this project move forward in as timely a manner as possible. After a thorough review, EPA has rated this DEIS as EC-2 (Environmental Concerns-Insufficient Information). A copy of EPA's rating definitions is enclosed. The EC-2 rating is based on several concerns raised from the DEIS having no alternatives for the decision maker or public to choose from.	See response to Comment 21
21	Joe Summerlin (Environmental Protection Agency)	PDF	1 of 2	This DEIS has only the proposed alternative and a no build alternative. This is inconsistent with 40 C.F.R. 1502.14 "Alternatives Including the Proposed Action." EPA believes it is reasonable to assume many alternatives have been considered and eliminated during the NEPA process, but were excluded by DOE for unknown reasons; EPA recommends including other alternatives based on site locations , considered, types of energy considered, and types of wind turbines considered (conventional and unconventional).	<p>Western Area Power Administration (Western) submitted the Draft Environmental Impact Statement (DEIS), Interconnection of the Grande Prairie Wind Farm, Holt County, Nebraska, June 2014, DOE/EIS-0485 (CEQ # 20140171) to the Environmental Protection Agency (EPA) for review on June 26, 2014. EPA responded by letter dated July 14, 2014 with a rating of EC-2 (Environmental Concerns-Insufficient Information).</p> <p>Western believes that the EPA's rating of EC-2 and comments are primarily based on a misreading of the Purpose and Need and the Proposed Federal Action as stated in the DEIS, as well as a misunderstanding of the nature of Western's legal responsibilities and authorities in managing Western's transmission infrastructure, and interconnection requests in general.</p> <p>As stated in the DEIS, Western's purpose and need is:</p> <p style="text-align: center;">"Grande Prairie Wind requests to interconnect its proposed Project with Western's transmission system at Western's Fort</p>

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					<p>Thompson to Grand Island transmission line (see Section 2.2.1.4 for interconnection location). Western’s purpose and need is to consider and respond to the interconnection request in accordance with its Tariff and the Federal Power Act. Under the Tariff, Western offers capacity on its transmission system to deliver electricity when capacity is available.</p> <p>The Tariff also contains terms for processing requests for the interconnection of generation facilities to Western’s transmission system. In reviewing interconnection requests, Western must ensure that existing reliability and service is not degraded. Western’s Tariff provides for transmission and system studies to ensure that system reliability and service to existing customers are not adversely affected by new interconnections. These studies also identify system upgrades or additions necessary to accommodate the proposed Project and address whether the upgrades/additions are within the project scope.”</p> <p>Please note that Western’s Purpose and Need under this DEIS is limited to the consideration of approving or not approving a transmission interconnection request. Westerns purpose and need does NOT include the generation of electrical power by any means. Since the interconnection request can only be approved or not approved, the logical range of alternatives is limited to 2: approved, or not approved. In this case, if approved, the operational interconnection agreement to be executed would include Western building, owning and operating a small switchyard at the interconnection location to accommodate the physical interconnection.</p> <p>Western’s Proposed Action (Action Alternative) as stated, in part, in the DEIS is:</p> <p>“Western’s Proposed Federal Action is to execute an interconnection agreement with Grande Prairie Wind to interconnect the proposed Project to Western’s transmission system and to construct, own, operate, and maintain a new switchyard adjacent to its Fort Thompson to Grand Island 345 kV transmission line to accommodate that interconnection.”</p> <p>The No Action alternative as stated in the DEIS is:</p> <p>“Under the No Action Alternative, Western would not approve an interconnection request with Grande Prairie Wind. For the purposes of impact analysis and comparison in this EIS, it is assumed that the proposed Project would not be built and that the environmental impacts associated with</p>

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					<p>construction and operation of the proposed Project would not occur.”</p> <p>Although the No Action Alternative as stated, “. . .it is assumed that the proposed Project would not be built. . .” this is assumed only for the purpose of the analysis. The No Action Alternative does not actually prevent the generation project from being constructed. It is a private project on private land. The No Action Alternative simply means that Grande Prairie Wind Farm would not be allowed to interconnect with Western’s transmission infrastructure, but could be interconnected with a different transmission service provider in the area, like any private project might be able to do.</p> <p>Western’s NEPA documents typically include a fairly detailed description of the requestors proposed generation project, primarily in the interest of public disclosure. This description usually includes an Applicant’s Purpose and Need and their Proposed Action separate from Western’s. However, this public disclosure does NOT include or imply Western’s oversight or control of any aspect of the requestors privately held proposed project. All regulatory responsibility for siting, location and other technical aspects of any private electric generation utility lies with the State and County authorities; in this case, Nebraska and Holt County. Western does not intend to abrogate those responsibilities.</p> <p>EPA’s concern for the lack of alternatives regarding siting and turbine design is misplaced. Westerns requirements for evaluating a projects potential effects on the integrated system’s safety and reliability is by necessity, contingent upon very technical and precise parameters and data that can only be determined at the final planning stages of a generation project. The system impact studies required for the integration of private power generation facilities are dependent upon the final design of the generation facilities themselves. Generally, because of the nature of the required interconnection application process and the part that System Impact Studies play in the interconnection requests, a mature planning process is crucial. In short, the interconnection process is not initiated until a generation project is in its FINAL stages of development. At the same time, Western cannot begin any system impact study or environmental review unless and until there is an interconnection request made by the project proponent.</p> <p>Western does not have the authority to discuss private lease or siting arrangements negotiated between a private wind generation developer and a private landowner in regard to “long term health and aesthetic issues” associated with a private generation project. Western does not, and cannot involve itself in the development, siting, or design aspects of privately held generation facilities on private land. It</p>

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					<p>should also be understood that alternatives to locations, turbine designs and other technical aspects of a project that may have been considered and eliminated by private developers for private generation projects on private land is generally proprietary information not available to Western.</p> <p>In short, DOE (Western) has not eliminated any alternatives available to them for this interconnection request. EPA simply overstates the alternatives available for consideration under Western's authorities and responsibilities in considering interconnection requests.</p>
22	Joe Summerlin (Environmental Protection Agency)	PDF	1 of 2	Given the number of bird and bat strikes from conventional wind turbines, were there any considerations to unconventional wind turbines? If so, why were they discarded as alternatives? What, if any, considerations were given to the use of a turbine that minimizes bird/bat strikes? EPA recommends including answers to these questions in the Final EIS to better inform both the public and decision maker.	See response to Comment 21. EPA's concern for potential bird and bat strikes is shared by Western. Efforts to minimize the effects of the Project on wildlife and birds were discussed within the DEIS. Western strongly encourages project proponents to work directly with the US Fish and Wildlife Service (USFWS) and state agencies in developing strategies that minimize the effects of wind generation projects on bird, bat, and other wildlife populations. Grande Prairie Wind is currently working directly with USFWS and the Nebraska Game and Parks Commission biologists on development of a Wildlife Conservation Strategy.
23	Joe Summerlin (Environmental Protection Agency)	PDF	1 of 2	The DEIS also states on several different occasions that land owners may be willing to waive the minimum 1/2 mile rule for wind turbines. Could Western work with those residents and the energy supplier to invest in smaller or unconventional turbine systems, especially given that residents may not fully understand the long-term health and aesthetic issues associated with conventional three-bladed horizontal-axis wind turbines? EPA recommends including answers to these questions in the Final EIS to better inform both the public and decision maker.	Two landowners approached Grande Prairie Wind, LLC and requested to sign set-back waivers in order to maximize the number of turbines on their properties. There are a total of five turbines which would encroach upon the 1/2 mile setback; however, the turbines are proposed to be no closer than 1,200 feet from the homes, which is consistent with the industry standard setbacks from occupied dwellings. Additionally, these dwellings are both surrounded by mature coniferous and deciduous tree shelterbelts, which will greatly reduce the impacts of noise and shadow flicker caused by the five turbines. Although encroaching upon the 1/2 mile setback, the turbines still meet the 50 dBA noise requirement of the Holt County zoning regulations. Grande Prairie Wind requested and was granted a variance to a dwelling setback, with the consent of the landowner, as part of the Holt County Conditional Use Permit approval process in September 2014.
24	Joe Summerlin (Environmental Protection Agency)	PDF	2 of 2	Although the area selected in Holt County, Nebraska might be the best spot for a new wind farm, what other sites were considered and why were those sites not selected? EPA recommends including at least one other site that was studied and why it was eliminated as an alternative in the Final EIS.	See response to Comment 21.
25	Howard Frickel	Written	1 of 1	The Grande Prairie Wind Farm proposed for Holt County Nebraska is dumb idea. It needs to be stopped in its tracks. How many birds have to die for this project and how many cancer cases will this project cause. Stop it before it starts: we need pipelines not turbines!	Thank you for your comment.

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26	Maurice Koenig	E-mail	1 of 1	I am sending this e-mail in support of the Grand Prairie Wind Farm project. I am one of three Directors and Vice President/Secretary of Agricultural Services Inc., a fertilizer and chemical retail company providing custom application services in central Nebraska with operations within and surrounding this wind farm project area. We have two retail plants in Holt County where this project is located and five retail plants located in Grand Island and four other communities surrounding Grand Island. Our corporate office is located in Grand Island, Nebraska. In addition to the retail business, our company operates a 1600 acre farm within the Grande Prairie Wind Farm project area. I am also a past president of the O'Neill Area Chamber of Commerce and served on the Chamber Board for 9 years.	Thank you for your comment.
27	Maurice Koenig	E-mail	1 of 1	We strongly support the construction and operation of this project as it will have a substantial positive economic impact on our local economy for many years into the future. I am 61 years young, so obviously this project will not have a huge impact on me personally through the rest of my business career. However, we are a 100% employee owned company (ESOP Company) with approximately 85 full time employees and 30 part time employees. This project would have a substantial positive effect on our employee owners and our community for many years into the future.	Thank you for your comment.
28	Maurice Koenig	E-mail	1 of 1	Since O'Neill is not located on a major interstate highway or a major rail line it is difficult for our community to participate in many business growth opportunities compared to communities that are strategically located near those transportation networks. However, we are located adjacent to a very good connection point to the national power grid through the WAPA transmission line adjacent to the proposed wind farm. The wind/electricity generation industry can coexist very well with our local agricultural industry consisting of crop production, beef production, and pork production. The added tax base is a substantial benefit to our entire county, and not just the people in the project area. There are not many opportunities on the horizon like this one to take advantage of for the benefit of the entire area.	Thank you for your comment.
29	Maurice Koenig	E-mail	1 of 1	We strongly recommend that you approve this project as it is environmentally friendly and economically friendly at the same time. Thank you for the responsibility you take in your position as Environmental Protection Specialist and for your consideration of our recommendations.	Thank you for your comment.
30	Ryan Green (Nebraska Department of Environmental Quality)	E-mail	1 of 1	The Nebraska Department of Environmental Quality (NDEQ) has reviewed the above referenced project. As with any project, permits may be required prior to beginning construction or operation. At a minimum, you should be aware of the possible requirements or permits..... <ul style="list-style-type: none"> <li>• Nebraska Title 129, Chapter 32 fugitive dust regulations will apply for all soil disturbances during construction.</li> <li>• Authorization under the Construction Storm Water – General Permit will be required. Early and active participation in consultation with the Nebraska Game and Parks Commission will be necessary by project proponents to assure eligibility under the Construction Storm Water General Permit (CSW-GP) (Part I.C.3 and Part III F).</li> <li>• The project proponent will need to consult with the U.S. Army Corps of Engineers and the NDEQ to ensure compliance with Section 404/401 of the Clean Water Act.</li> <li>• Any solid or hazardous wastes generated or discovered during project operations must be properly handled, contained, disposed, and (if necessary) characterized, and follow all applicable regulations in Nebraska Title 128 and Title 132. When dealing with existing powerlines, be aware of possible polychlorinated biphenyl (PCBs) in old transformers.</li> </ul>	Thank you for your comment. Grande Prairie will obtain all necessary county, state, and federal permits prior to construction and operation of the wind farm.

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31	Robert F. Stewart (Department of the Interior)	PDF	1 of 9	The project has the potential to impact the visual resources of the Missouri National Recreation River and the Lewis and Clark National Historic Trail. Both parks expressed concerns at the Notice of Intent stage of the EIS process, and reviewed the visual analysis prepared for the EIS prior to its release. In addition, the visual analysis was reviewed by a Visual Resource Specialist in NPS's Denver-based Air Resources Division. The methodology for the viewshed analysis seems sound and the target heights and 30 meter (m) data used are adequate. However, the viewshed analysis maps indicate the use of a 159 m (521 feet) tall target, which is the tallest potential turbine. The EIS notes the use of a 246.6 foot object (p. 4-133). This should be clarified as to which is correct.	The text in Section 4.11.1.2 has been changed to 521 ft. The 521 ft height was used for the analysis.
32	Robert F. Stewart (Department of the Interior)	PDF	1 of 9	We also note that page 7 of the viewshed analysis has the color coding of visible/not visible turbines backwards. The impact analysis methodology and conclusions are generally good and indicate that the project will be a dominant feature from some of the viewpoints. Previous visibility studies of wind farms in the west conclude that turbines could likely be a major focus of attention out to about 10 miles, and the wind farms included in the studies were generally smaller than the proposed project.	Page 7 of the viewshed analysis has been revised.
33	Robert F. Stewart (Department of the Interior)	PDF	2 of 9	Most views from the Niobrara River should be obscured by terrain, but any visitors who access the high ground near the river would have a view dominated by the wind farm to the south. The viewshed analysis does indicate that many turbines will be visible from three different viewpoints along the Niobrara River. Two are located on the north side of the river (GPW-PT2 and 6) and one on the south side (GPW-PT 4) at a distance of approximately 7 miles or greater. It also appears there would be no visibility of turbines from the visitor center so the overall effects to the visitor experience should be minimal. Any visibility from the Lewis and Clark Trail (including the auto route) would be distant and the impacts minor. There do not appear to be effects to the views from the Missouri River, but if the project is visible from any high points, the increased distance should reduce the potential impacts.	Thank you for your comment.
34	Robert F. Stewart (Department of the Interior)	PDF	2 of 9	According to the document schedule discussed during meetings with Geronimo Energy and Western, their plan was to issue the FEIS late in the fall of 2014. In June, 2014, both an active and productive bald eagle nest, and the occurrence of American burying beetles at two locations were documented within the Grande Prairie (Project) boundaries. Given that there will likely be information or surveys needed relative to American burying beetle and bald eagle use of the site after the planned issuance of the FEIS, Geronimo Energy and Western should decide how to best proceed with addressing their responsibilities under NEPA and other federal statutes. Unanticipated avoidance and minimization measures will need to be developed for these species prior to issuance of the FEIS and final Biological Assessment (BA).	A Biological Assessment and a Wildlife Conservation Strategy (formerly a Bird and Bat Conservation Strategy) is being developed in consultation with USFWS and NGPC. Avoidance and minimization measures included in these documents have been included in the FEIS (see Sections 4.7.1.5 and 4.8.1.9).
35	Robert F. Stewart (Department of the Interior)	PDF	2 of 9	It would be helpful for the Final EIS to include the various survey reports of the site as Appendices to the document. This would be more convenient for the reader than repeatedly referring to Western's website to find pertinent information.	Western attempts to limit the "hard copies" of our environmental documents to a bare minimum. Electronic copies are available on-line in PDF format, which can be viewed on-line, downloaded to any computer with access to the internet, or printed at the reviewer's or other locations. All appendices/reports are located at the same web location as are the environmental documents, and any or all can be downloaded and/or printed at the reviewer's discretion.  Western believes this approach limits the use of paper for hard copies to only those who require them, and reduces shipping and other costs. In addition, the documents are instantly available to most interested parties, and the PDF copies of the documents are electronically

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					searchable which make them easier for most technical reviewers to examine.
36	Robert F. Stewart (Department of the Interior)	PDF	2 of 9	1. ES 3.2.4, Page ES-6: How much heat will be generated by the 3 individual, 6-inch circuits rated at 34.5kW? If the heat is sufficient to keep the ground from freezing while the American burying beetles (ABB) are estivating, that would adversely affect any ABB within the thawed soil around the cables. Would the fiber optic cable also generate any heat?	Fiber optic cable does not generate any heat. The amount of heat generated by the 34.5 kW underground electrical cable is dependent upon site specific factors, including soil type. The soils in the Grande Prairie Wind Farm have high thermal resistivity which tends to prevent heat from dissipating through the soil. Based on information conveyed during an August 6, 2014 meeting with Grande Prairie Wind, LLC, Western, USFWS and NGPC, ABBs were noted to hibernate below the frost line. The 34.5 kW underground electrical cable is buried to a depth of 4 feet, which is also below the frost line. Since the ABBs and the underground electrical cable are both below the frost line, the heat generated will not prevent the ground from freezing.
37	Robert F. Stewart (Department of the Interior)	PDF	2 of 9	2. ES 3.2.7, Page ES-7/8: If temporary met towers are up for one year, they will potentially affect two migrations of night-migrating songbirds. Take of night-migrating songbirds is likely at guyed temporary towers even when they are fitted with bird flight deflectors visible during the day. Ensure all obstruction lighting on permanent or temporary MET towers meets the new FAA recommendations. (New lighting requirements adopted by the FAA in late-2012 to reduce avian mortality from obstructions ( <a href="http://www.airporttech.tc.faa.gov/safety/downloads/TC-TN12-9.pdf">http://www.airporttech.tc.faa.gov/safety/downloads/TC-TN12-9.pdf</a> ). The USFWS recommends the proposed tower have the minimum number of pilot warning and obstruction avoidance lighting required by the Federal Aviation Authority (FAA). Unless otherwise required by the FAA, only white or red strobe lights should be used at night, and these should be the minimum number, minimum intensity authorized by the FAA, and flash between 27 and 33 flashes per minute. Light emitting diodes (LED) lights are less expensive than incandescent lights and are more effective at reducing take of migratory birds. The use of constant red or pulsating (beacon) red warning lights at night should be avoided.	Grande Prairie Wind, LLC plans to mark and light the wind turbines and meteorological towers in a manner prescribed by the FAA's guidelines and as required under conditions of the Aeronautical Studies relating to the project.
38	Robert F. Stewart (Department of the Interior)	PDF	3 of 9	3. ES 3.2.10, Page ES-9: Change statement regarding seed mixture used for site reclamation to include participation by NGPC botanist, Gerry Steinauer, as discussed during the 6/25/14 conference call among all parties.	Text has been revised throughout the EIS as appropriate reflecting Grande Prairie Wind, LLCs commitment to coordinate with NGPC botanists regarding seed mixtures.
39	Robert F. Stewart (Department of the Interior)	PDF	3 of 9	4. ES 3.2.13, Page ES-10: Project area characteristics and potential impacts to sensitive wildlife species from decommissioning activities taking place 20 to 40 years from now are difficult to assess at this time. Prior to decommissioning, the project proponent and Western should re-coordinate with the USFWS and the NGPC to discuss timing and other specifics of decommissioning activities which may affect wildlife and their habitats.	Grande Prairie Wind, LLC has committed to re-coordinate with the USFWS and the NGPC prior to decommissioning activities.  Western's decommissioning activities at the end of the project lifespan would be limited to the single small switchyard owned and operated by Western. When and if a decision is made to decommission that system component, Western will assess the potential impacts of such a decommissioning and evaluate the need to initiate Section 7 consultation with the USFWS.

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40	Robert F. Stewart (Department of the Interior)	PDF	3 of 9	5. Table ES-1, Pages ES 12/13: Obviously, evidence of ABB and bald eagle occupation of the project site was not available when this section was written. Impacts to these species and procedures to be used to minimize take of these species during construction, operation and decommissioning need to be discussed. Additionally, the USFWS disagrees with the statement that construction and decommissioning of the wind development will result in a "... small acreage of anticipated disturbance...." Using several assumptions based on construction and facilities described in the DEIS, up to 5,107 acres (temporary disturbance of up to approximately 5,052 acres; permanent disturbance of up to approximately 95 acres) may occur during construction, with a similarly substantial but lower amount disturbed during decommissioning (Please see comment number 26), below). Both temporary and permanent surface and subsurface impacts can cause mortality of ABB in areas where ABB are found. Furthermore, there are several conclusions on this page stating that impacts to birds, threatened or endangered species, or eagles are not expected to be "significant." Any unauthorized mortality of migratory birds, threatened or endangered species, or eagles is unlawful under the MBTA, ESA and BGEPA, respectively.	The EIS has been revised to include updated 2014 survey results for ABB and bald eagles and impacts to these species are addressed in the EIS. The EIS has been updated to include a take estimate or ABB based upon the 2014 survey results.  The effects determinations in Table ES-1 have been revised based on updated survey results. In addition, Table 4.2-1 has been added to clarify temporary and permanent disturbance by project component. Tables 4.8-1 and 4.8-2 illustrate these impacts on ABB habitat.
41	Robert F. Stewart (Department of the Interior)	PDF	3 of 9	6. Table ES-1, Page ES-15. Do the conclusions regarding noise and public health and safety include the effects to area residents from noise and strobe effects of turbines 1,200 feet from inhabited dwellings?	Yes, the effects of noise and shadow flicker were modeled for all residences within the project area and within one mile of the project area including those residences which may be located within 1,200 feet of a proposed turbine. The Project would be in compliance with the Holt County Zoning Regulation regarding noise and shadow flicker (see Sections 4.11.1 and 4.12.1).
42	Robert F. Stewart (Department of the Interior)	PDF	3 of 9	7. Page 1-6: The Endangered Species Act, Section 9, prohibits take (including death, harm or harassment) of any threatened or endangered species. For the purposes of evaluating potential impacts from the Grande Prairie project, Western has agreed to treat the proposed-for-listing northern long-eared bat as listed.	Western is treating both the northern long-eared bat and rufa red knot as listed species.
44	Robert F. Stewart (Department of the Interior)	PDF	3 of 9	9. Section 1.7, Page 1-13: The USFWS suggests Western consider the issuance of a Supplemental DEIS prior to the final EIS, to allow public input regarding the discovery of ABB and an active bald eagle nest on the project site subsequent to issuance of this DEIS.	The DEIS developed for the Grande Prairie Wind Farm sufficiently considered the likely impact of the Project on each of the three species discovered within the Project area during ongoing surveys (the American burying beetle ("ABB"), the bald eagle, and the northern long-eared bat ("NLEB")) and therefore a Supplemental Environmental Impact Statement (SEIS) is not required for the Grande Prairie Wind Farm. The consideration of each of the above species in the DEIS is outlined below: • ABB - At the time the DEIS was published, extensive trapping surveys had failed to detect the presence of the ABB within the Project area, but the DEIS acknowledged that certain areas of the Project have soil that is attractive to the ABB, and that ABB have been documented elsewhere in Holt County. The DEIS concludes: "because the species does not appear to occur in the Project area, proposed Project activities including construction, operation and maintenance, or decommissioning may affect but would not adversely affect the [ABB]." It provides further that if construction of the Project occurs after the summer of 2013, additional presence/absence studies should be conducted. A total of 2 ABB were located in the Project Area during summer 2014 ABB surveys. While the DEIS's conclusion was drafted such that the finding of no adverse effect

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					<p>appears premised on the absence of the ABB, the DEIS clearly considers the possibility that the ABB could be found within the Project area in the future.</p> <ul style="list-style-type: none"> <li>• Bald Eagles - The DEIS incorporates studies of bald eagles in and around the Project area. These studies revealed the presence of bald eagles and bald eagle nests in the vicinity of the Project area, but found no eagles nesting within the Project area. The DEIS provides that there are “currently no known eagle nests within the Project area; however, should one be discovered prior to or during construction, the guidelines set forth in USFWS Bald Eagle Management Guideline (USFWS2 2007) will be followed.” (DEIS, at 4-111). The DEIS recognizes that there are bald eagles in the immediate vicinity of the Project area and clearly considers the possibility that eagle nests may be found in the Project area itself. The DEIS also recommends a course of action in the event eagles nests actually are found and considers the impact of the Project on eagles throughout the lifecycle of the Project.</li> <li>• NLEB – The DEIS notes that while the presence of NLEB in the Project area had not yet been confirmed, the Project area is located in the known range of the NLEB, and NLEBs have been captured in the near vicinity of the Project area. The DEIS goes on to identify specific risks to the NLEB that would result from the Project’s construction, operations, maintenance, and decommissioning, including the risk of collisions with turbines and some loss and degradation of the NLEB’s habitat.</li> </ul> <p>The discovery of the ABB, an active bald eagle nest, and NLEB in the Project area are discussed at length in the Final EIS. In addition, Grande Prairie Wind has continued to work directly with USFWS and NGPC to develop strategies that minimize the effects of wind generation projects on bird, bat, and other wildlife populations. Bald eagle use surveys are ongoing at the site, and will continue through January 2015. Grande Prairie Wind is currently working directly with USFWS and the Nebraska Game and Parks Commission biologists on development of a Wildlife Conservation Strategy. In addition, Western sent the final Biological Assessment and request for formal consultation and formal conferencing on 1 October 2014.</p>
45	Robert F. Stewart (Department of the Interior)	PDF	4 of 9	10. Section 2.2.1.6, Page 2-23: see comment on section ES 3.2.7, Page ES-7/8, above.	See response to Comment 37.

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46	Robert F. Stewart (Department of the Interior)	PDF	4 of 9	<p>11. Section 2.2.2, Page 2-24/25: As discussed during more than one meeting/conference call with Western and Geronimo, grassland restoration in the sandhills is problematic due to the extent of extremely erodible soils. Some Best Management Practices that are effective in other environments are less (or not) effective in the sandhills. As noted above, the project proponent should include input from the NGPC botanist when determining choice of seed mixes used for restoration of grasslands to avoid use of grass cultivars that become invasive. Additionally, a section should be included in the FEIS describing measures to be taken by Geronimo Energy should grassland restoration fail at one or more locations on the Grande Prairie site. Such discussion should include a discussion of parameters constituting restoration failure.</p>	<p>Grande Prairie Wind, LLC will work with the construction contractor to ensure effective Best Management Practices are implemented that are suitable for construction work in the sandhills as a part of the Stormwater Pollution Prevention Plan that will be developed and implemented for the Construction Storm Water – General Permit. This will ensure adequate stabilization is reached following completion of construction. GPW will also consult with the NGPC botanist to determine the appropriate seed mix for restoration in the sandhills in order to avoid use of grass cultivars that become invasive. Other BMPs that are effective in the sandhills and could be incorporated as part of the stormwater permit may include the following:</p> <ul style="list-style-type: none"> <li>• Increase watering frequency in the sandy soils during construction</li> <li>• Using a soil amendment (i.e. manure) in sandy areas during stabilization</li> <li>• Utilizing a permanent irrigation system to help with restoration <ul style="list-style-type: none"> <li>• Utilizing weed control practices following construction and during restoration</li> </ul> </li> </ul> <p>Prior to being issued a Notice of Termination as part of the Construction Storm Water – General Permit, restoration and stabilization would have to be achieved.</p> <p>Grande Prairie Wind, LLC will work with the construction contractor to ensure effective BMPs are implemented that are suitable for construction work in the sandhills. BMPs are integral to the Stormwater Pollution Prevention Plan (SWPPP) that will be developed and implemented for the Construction Storm Water – General Permit for the project. The Construction Storm Water – General Permit will ensure adequate stabilization is reached following completion of construction. Grande Prairie will also consult with the NGPC botanist to determine the appropriate seed mix for restoration in the sandhills in order to avoid use of grass cultivars that become invasive. Other BMPs that are effective in the sandhills and could be incorporated as part of the Construction Storm Water – General Permit may include the following:</p> <ul style="list-style-type: none"> <li>• Increase watering frequency in the sandy soils</li> <li>• Using a soil amendment/soil tech in sandy areas during stabilization</li> </ul> <p>Prior to being issued a Notice of Termination as part of the Construction Storm Water – General Permit, restoration and stabilization would have to be achieved.</p>

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47	Robert F. Stewart (Department of the Interior)	PDF	4 of 9	12. Section 2.2.3.1, Page 2-25: The USFWS considers one year of post-construction mortality monitoring insufficient to support or validate expected impacts to migratory birds, bats and other resources presented in Table ES-1.	Grande Prairie Wind is currently working directly with USFWS and the Nebraska Game and Parks Commission biologists on development of a Wildlife Conservation Strategy. Grande Prairie Wind, LLC will consult with USFWS and NGPC after the first year of post-construction mortality monitoring to determine whether additional study is necessary.
48	Robert F. Stewart (Department of the Interior)	PDF	4 of 9	13. Section 3.5.2, Page 3-32: The first paragraph in this section describes the study area as being approximately 57% grassland and 43% cultivated crops (or 100%). Yet, in the wetlands section, (Section 3.6.2), the document notes that wetlands cover about 1,718 acres, or about 3% of the area, and woodland areas are described as "... small (<100 acres), widely scattered woodlands...." It would be helpful if the acres of trees could likewise be noted, including whether in the uplands or riparian areas.	Section 3.5.2 has been revised to include all landcover types found in the project area based on National Landcover Data. The wetland acreages in Section 3.6 were based on field determinations conducted by Olsson Associates in 2012.
49	Robert F. Stewart (Department of the Interior)	PDF	4 of 9	14. Section 3.6.2, Page 3-37, last sentence of 3rd paragraph: The reader is left with the impression that the wetland boundaries in the croplands and elsewhere "were adjusted" by making them smaller. Note that in 2012, Nebraska suffered a near record drought, the worst since the 1930s. Therefore, the wetlands would not be as large as large as usual, due to the drought. By early June, the cultivated crops would have been planted and the (dry) wetland boundaries likely obscured. It might be useful to recheck a random sample of the wetlands this year to see if the boundaries have truly changed.	A second wetland delineation was conducted in 2014 in areas that will potentially be impacted by construction. Sections 3.6.2 and 4.6.1 have been revised to include the new information.
50	Robert F. Stewart (Department of the Interior)	PDF	4 of 9	15. Section 3.7.2.3, Page 3-44, last paragraph of Raptor Nest Survey subsection: This section will need to be revised to reflect the June, 2014, discovery of an active bald eagle nest within the project boundaries. While the this eagle nest was not located in time to be included in this DEIS, it isn't clear why stick nest surveys conducted in late April or early May could not be included in the DEIS.	Section 3.7.2.3 has been revised to include the final stick nest survey results.
51	Robert F. Stewart (Department of the Interior)	PDF	4 of 9	16. Section 3.7.2.6, Page 3-47, Eagle Stick Nest Survey subsection: Again, the results of the early April, 2014, eagle stick nest surveys are reported in the DEIS. Why results of follow-up eagle stick nest surveys conducted in late April or early May not included in a DEIS issued in mid-June, 2014.	Section 3.7.2.6 has been revised to include the final stick nest survey results.
52	Robert F. Stewart (Department of the Interior)	PDF	5 of 9	17. Section 3.8.2.1, Page 3-48: Regarding least tern and piping plover discussion, the document correctly states that there is no suitable breeding habitat for either of these species in the project area. While there is evidence that least terns are not likely to occur in the project area during migration, the migration routes of piping plovers are not well understood, and the species is known to breed in the Niobrara River only five or six miles north of the project area. If there is evidence available to indicate that piping plovers do not migrate over the project area, then it should be presented here. The lack of observation of piping plovers during pre-construction avian surveys at Grand Prairie does not support the conclusion that piping plovers could not occur at the project site during migration; the avian surveys are conducted in June, when piping plovers are already on their breeding areas.	Section 3.8.2.1 has been revised to accurately reflect the current knowledge of piping plover migration.
53	Robert F. Stewart (Department of the Interior)	PDF	5 of 9	18. Section 3.8.2.1, Page 3-49: Replace the last sentence on this page with: "It's estimated that only about 4 percent of whooping crane stopovers are documented as confirmed each year (USFWS 2009)."	Text has been revised.
54	Robert F. Stewart (Department of the Interior)	PDF	5 of 9	19. Section 3.8.2.1, Page 3-53: The DEIS should acknowledge that whooping cranes have been observed roosting and foraging in stock ponds, flooded crop fields and in wet meadows on numerous occasions, which do and can occur during migration periods in the Project area. Additionally, whooping cranes will use shallow areas along the shores of lacustrine wetlands and reservoirs, especially when lake levels are low.	The information on use of stock ponds, flooded crop fields and wet meadows by whooping cranes during migration has been added to the discussion of stopover habitat in Section 3.8.2.1.

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55	Robert F. Stewart (Department of the Interior)	PDF	5 of 9	20. Section 3.8.2.1, Page 3-62, Item number 3): As noted above, whooping cranes can and do roost in flooded or ponded areas of cultivated grain fields. In a typical year during spring and fall whooping crane migration periods, flooded grain fields provide shallow water for roosting, forage (waste grain and transient insects and amphibia) and good visibility- all characteristics of good stopover habitat. Again, note that the summer of 2012 was one of the driest on record in Nebraska, so the absence of wet playas in this area is not surprising.	Thank you for your comment.
56	Robert F. Stewart (Department of the Interior)	PDF	5 of 9	21. Section 3.8.2.1, Page 3-62, American Burying Beetle (ABB): The Project area no longer lies outside the known range of the ABB, as stated at the start of the second paragraph in this section. Based on additional ABB surveys conducted through 2013, the range map for ABBs in Nebraska was revised in April, 2014, to extend into western Knox county to the east of the Project area. This section will also need to be modified to include the presence of ABB at two locations within the Project boundaries during follow-up ABB trapping in June 2014.	The American burying beetle subsection in Section 3.8.2.1 has been updated with the new range information and the results of the 2014 survey.
57	Robert F. Stewart (Department of the Interior)	PDF	5 of 9	22. Section 3.8.2.1, Page 3-67, Item 1): The Project area is not located at the western edge of the northern long-eared bat's (NLEB) range. In Nebraska, the range of NLEB extends west along the Niobrara River and into Montana, and the creeks described as the most likely areas to provide NLEB habitat are wooded tributaries to the Niobrara River which flows into the Missouri River about 17 miles northeast of the Project area.	The northern long-eared bat subsection of Section 3.8.2.1 has been revised based on the 2014 survey results.
58	Robert F. Stewart (Department of the Interior)	PDF	5 of 9	23. Section 3.8.2.1, Page 3-67, Item 2): That the "...species abundance in central Nebraska is largely unknown..." means that we don't know how many occur there, not that the species doesn't occur there. Absence of evidence does not provide evidence of absence. Additionally, approximately 1.7% of the estimated 54,000-acre Project site equals about 920 acres. The riparian tributary streams to the Niobrara River provide corridors of NLEB habitat to an area of known occurrence- the Niobrara River. The last two sentences summarizing the NLEB subsection are completely accurate and unambiguous.	See response to Comment 57.
59	Robert F. Stewart (Department of the Interior)	PDF	6 of 9	24. Section 4.2.1.1, Page 4-89: Please include a table identifying sources of soil disturbance that sum to 2,709 acres. Because ranges of potential impacts from various Project components are so prevalent and broad (e.g., 45 to 60 miles of new access roads with widths of from 40 to 60 feet) it is the USFWS's understanding that the DEIS analyses uses the higher quantity in the ranges, to be inclusive. However, based on the project descriptions in Section 2.2.1 (access roads, turbines, turbine and construction lay-down areas, electrical substations, O&M building, MET towers, new temporary access roads, etc.), and several assumptions, the USFWS estimated nearly twice the disturbed area: 5,052 acres of temporary disturbance, and 95 acres of permanent disturbance. It would be very useful to have an explanatory table to explain the sources of the permanent and temporary disturbances.	Table 4.2-1 has been added to the document and includes calculations of temporary and permanent impacts.
60	Robert F. Stewart (Department of the Interior)	PDF	6 of 9	25. Section 4.2.1.5, Page 4-90: Again, the USFWS cautions Geronimo regarding the effect of breaking the grass cover over multiple large areas high on the dunes Where turbines are most likely to occur, in the Nebraska Sandhills portion of the Grande Prairie Wind Farm. Native grasslands cover a substantial portion of the Project site. The USFWS recommends Geronimo develop a plan of action should initial restoration efforts using typical BMPs fail.	See response to Comment 46.

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61	Robert F. Stewart (Department of the Interior)	PDF	6 of 9	26. Section 4.5.1.4, Page 4-96: Local vegetation resources would be affected on temporary disturbance areas as well as the 235 acres permanently disturbed. Grading or other removal of mixed grass prairie vegetation, whether temporary or permanent, may adversely affect ABB, depending on the depth of grading and time of year. Avoidance and minimization and mitigation measures need to be developed to address potential ABB effects, including use of mechanical and or chemical control methods to control weeds. The seed mixture to be used in grassland restoration should include recommendations for the NGPC botanist to ensure invasive cultivars of various grassland species are avoided.	Avoidance and minimization measures for the American burying beetle have been developed and are described in Section 4.8.1.9 and in the Project Wildlife Conservation Strategy. Grande Prairie Wind. LLC will coordinate with NGPC to develop suitable grassland seed mix.
62	Robert F. Stewart (Department of the Interior)	PDF	6 of 9	27. Section 4.6.1.4, Page 4-97: A common location for ABB occurrence is along the bench above wetland boundaries. The FEIS needs to discuss avoidance, minimization and mitigation measures to reduce impacts to this part of wetlands and, potentially, to ABB.	See response to Comment 61.
63	Robert F. Stewart (Department of the Interior)	PDF	6 of 9	28. Section 4.7.1.1, First paragraph, Page 4-98: In other areas of the DEIS, native grassland is not described as “very limited” within the project area. How many acres of native prairie, whether grazed or not, occurs in the northern and western areas of the Project site, where grassland dominates?	Text in Section 4.7.1.1 has been revised.
64	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	29. Section 4.7.1.2, Table 4.7-1, Page 4-102: While standardized, the amount of bat mortality at these wind energy developments is elusive unless the number of MW produced at the facilities is included.	Mortality per megawatt is the standardized format for presenting mortality so that all wind farms can be compared per the USFWS Land-Based Wind Energy Guidelines. The studies outlined in this table did not all provide the total MW produced by the facility. Therefore, the table was not able to be updated as requested.
65	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	30. Section 4.7.1.2, Page 4-103: The statement “...The Project area lacks forested corridors and other vertical features and has limited amount of suitable foraging and roosting habitat...” is inaccurate. Remove or modify statement. See comment 25, above.	The statement in Section 4.7.1.2 has been revised.
66	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	31. Section 4.7.1.2, Last paragraph, Page 4-103: Discuss the stated bat mortalities within the context of the effects and spread of WNS on bat populations.	See Section 4.18.2.3, Bat Mortality from White-Nose Syndrome.
67	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	32. Section 4.7.1.3, Page 4-104: Please explain how construction of a wind facility with numerous access roads over thousands of acres of grasslands does not fragment grassland habitat for birds. Not all pastures are overgrazed to the point of providing no habitat. Access roads become travel routes for numerous predators that prey on grassland birds, effectively opening large areas to more effective predation.	Text in Section 4.7.1.3 has been revised.
68	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	33. Section 4.7.1.3, Page 4-106: The first full sentence on Page 4-106 is inaccurate. Modify or remove.	The sentence in Section 4.7.1.3 has been revised based on the 2014 stick nest survey results.
69	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	34. Section 4.7.1.3, Page 4-107: That night-migrating passerines make up 50 percent of avian mortalities at most wind farm sites points to the importance of proper lighting at wind farm facilities, including temporary and permanent MET towers and down shielding or motion-sensor security lighting at all employee facilities. See comment 2., above.	See Section 4.7.1.5, Avoidance, Minimization, and Mitigation Measures for lighting BMPs.
70	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	35. Section 4.7.1.3, Page 4-108: Again, third sentence in second paragraph on this page is inaccurate. Remove or modify.	The sentence in Section 4.7.1.3 has been revised based on the 2014 stick nest survey results.
71	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	36. Section 4.7.1.3, Page 4-109: As noted by Michelle Koch during a recent meeting, bird populations suffer extensive mortality from multiple sources. That other sources kill more birds than wind farms is wholly irrelevant. All human-caused take of migratory birds is unlawful, and avoidance and minimization measures to reduce such take need to be included in the project description.	See Section 4.7.1.5, Avoidance, Minimization, and Mitigation Measures.

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72	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	37. Section 4.7.1.4, Page 4-111: This section needs to be modified to include the June, 2014, discovery of an active and productive bald eagle nest within Project boundaries. The EIS should also include the presence of a 2013, active bald eagle nest on Lamb Creek, just east of the Project boundary. What avoidance, minimization and mitigation measures will be implemented to reduce the likelihood of unlawful take of bald eagles?	Section 4.7.1.4 has been updated with the 2014 stick nest survey results, including the 2014 status of the Lamb Creek nest. BMP's specific to eagles have been added to Section 4.7.1.5.
73	Robert F. Stewart (Department of the Interior)	PDF	7 of 9	38. Section 4.7.1.5, Page 4-114, 2nd bullet: Installing marker balls on guy wires of tall MET towers reduces bird collisions during the day, but neither reduces nor prevents mortality of night-migrating songbirds. Modify this bullet to reflect same.	This bullet in Section 4.7.1.5 has been revised.
74	Robert F. Stewart (Department of the Interior)	PDF	8 of 9	39. Section 4.8.1.3, Page 4-115, first paragraph: Migration routes of piping plovers are not well understood. If Geronimo has evidence to support the conclusion that piping plovers are not expected to migrate through the Project area, when nesting habitat exists 5 to 6 miles to the north, it should be presented here. Otherwise, acknowledge that there is a small probability of piping plovers migrating through the Project site, but that the probability is likely insignificant.	See response to Comment 52.
75	Robert F. Stewart (Department of the Interior)	PDF	8 of 9	40. Section 4.8.1.4, Page 4-117, Item 3: As noted elsewhere, whooping cranes have been confirmed using stock ponds and flooded, cultivated grain fields during migration. Additionally, 3% of the projects 54,000 acres is 1,620 acres - not an insignificant amount. The last sentence of item 3) is belied by the fact that wetland soils occur in numerous cultivated fields and pastures. If these areas are not inundated during wet periods, wetland soils would not have developed there.	Based on NRCS soil mapping, hydric soils within the Project area occur mainly along stream corridors and within a few cultivated fields. See Figure 7 from the Whooping Crane Desktop Stopover Risk Assessment (available online at: <a href="http://www.wapa.gov/ugp/Environment/GrandePrairie.htm">http://www.wapa.gov/ugp/Environment/GrandePrairie.htm</a> ). Therefore, the hydric soil data do not suggest that large portions of the Project area are inundated during wet years.
76	Robert F. Stewart (Department of the Interior)	PDF	8 of 9	41. Section 4.8.1.4, Page 4-118: When discussing interaction of sandhill cranes with wind turbines, it is appropriate to include a statement that sandhill crane mortality from collision with turbines has been documented in at least two instances.	The two documented cases of sandhill crane mortality due to collision with wind turbines are discussed in Section 4.8.1.4.
77	Robert F. Stewart (Department of the Interior)	PDF	8 of 9	42. Section 4.8.1.4, Page 4-119: While there may be no documentation of whooping cranes colliding with transmission lines in the upper Great Plains, there have been collisions with distribution and other power lines documented, including in Nebraska. Omission of that fact causes the last sentence of the first paragraph on this page to be misleading.	Section 4.8.1.4 has been revised to provide clarification.
78	Robert F. Stewart (Department of the Interior)	PDF	8 of 9	43. Whooping crane section: As discussed previously, there is a reasonable chance during the next 40 years that whooping cranes could fly through the Grande Prairie wind farm. What makes the likelihood of mortality through collision insignificant is that a Whooping Crane Contingency Plan is developed and implemented in the unlikely event that whooping cranes may stopover during within 2 to 5 miles away from the Project site. Additionally, the above gen-tie line will be marked with bird flight diverters to reduce the potential for whooping crane collisions with the line. As stated in the sentence immediately preceding the underlined "Mortality Summary", "...Crane monitoring together with curtailment protocols and bird flight diverters are practical and effective measures for minimizing collision risk."	Grande Prairie Wind, LLC is developing a whooping crane contingency plan as part of the Wildlife Conservation Strategy in coordination with USFWS and NGPC. The contingency plan addresses construction and operation.
79	Robert F. Stewart (Department of the Interior)	PDF	8 of 9	44. Section 4.8.1.5, Page 4-119: This section needs to be rewritten to include the documentation in June, 2014, of ABBs occurring in at least two places within the Project boundaries. Avoidance, minimization and mitigation measures for potential take of this endangered species will need to be included in the Final EIS and Final BA.	Section 4.8.1.5 has been updated with the 2014 survey results and the impacts to American burying beetles as a result of the project.  Avoidance, minimization and mitigation measures for the American burying beetle have been added to Section 4.8.1.9.
80	Robert F. Stewart (Department of the Interior)	PDF	8 of 9	45. Section 4.8.1.5, Page 4-122: See comments 25 and 32, above, which also apply to statements on this page.	Section 4.8.1.5 has been revised.

Comment Number	Commenter	Format	Page	Comment	Response
81	Robert F. Stewart (Department of the Interior)	PDF	8 of 9	46. Section 4.8.1.9, Pages 123/124: The avoidance, minimization and mitigation measures listed here will need to conform with the measures for whooping cranes listed in the final BBCS, which will be included in the FEIS. Ditto for the NLEB subsection on pages 124/125.	The avoidance, minimization and mitigation measures discussed in Section 4.8.1.9 are consistent with the Wildlife Conservation Strategy.
82	Robert F. Stewart (Department of the Interior)	PDF	9 of 9	47. Section 4.8.1.10, Page 125: Modify the summary to reflect presence of ABB at the Project site. See also comment 46, above.	Section 4.8.1.10 has been revised to include a summary of impacts to the American burying beetle
83	Robert F. Stewart (Department of the Interior)	PDF	9 of 9	48. Section 4.8.1.10, Page 126: The sentence in the second paragraph includes a phrase that is untrue. Modify the sentence to reflect your intent. (There certainly have been many documented cases of crane mortality, including whooping crane mortality, in the upper Great Plains)!	The sentence in Section 4.8.1.10 has been removed.
84	Robert F. Stewart (Department of the Interior)	PDF	9 of 9	49. Section 4.18, Table 4.18-1, Pages 4-166/167: ABB and Bald Eagles should be added to this table and to the subsequent individual species sections	American burying beetle and bald eagle have been added to Table 4.18-1 and Section 4.18.
85	Terry Julesgard and Tammy Morrow- Julesgard	E-mail	1 of 2	My wife and I are writing in opposition to the construction of the Grande Prairie Wind Farm proposed for Holt County, Nebraska by Western Area Power Administration. I live approximately six miles north of the proposed site on a small acreage overlooking the Niobrara River Valley. I have several concerns regarding the creation of a large wind farm.	Thank you for your comment.
86	Terry Julesgard and Tammy Morrow- Julesgard	E-mail	1 of 2	The Draft Environmental Impact Statement DOE/EIS-0485 does not adequately address the impact to the local area in regards to climate change caused by large wind farms such as Grande Prairie Wind Farm.	Thank you for your comment.
87	Terry Julesgard and Tammy Morrow- Julesgard	E-mail	1 of 2	This area is predominately production agriculture of irrigated row crop farming and cattle production. Studies show large wind farms cause the temperature to be higher because the turbines continually mix the cooler air at the earth surface with the warmer air which is higher in the atmosphere, thus not allowing the nights to cool down. This will have an adverse affect on row crops by not allowing the plants to open up its leave surface to take in nutrients and breathe disrupting the plants growth. Also higher temperatures will require the producers to irrigate more increasing the cost of production. Alfalfa producers need the evening cool down to attract moisture to the cut hay so they can bail without losing the leaves. As for livestock and wildlife cooler temperatures during the nights give their bodies a chance to recover from the heat of the day and utilize areas of pasture which are too hot during the day. This including people too, we all look forward to the evening when the temperatures begin to cool so we can complete those tasks which were just too hot to do during the day. Liming Zhou, Research Associate Professor at the Department of Atmospheric and Environmental Sciences at the University of New York who has led the study of climate change associated with large wind farms said further research is needed into the effect of the technology on the wider environment. Thus, the potential for regional climate change caused by Grande Prairie Wind Farms needs to be studied completely before this project is allowed to move forward.	Thank you for your comment.

<b>Comment Number</b>	<b>Commenter</b>	<b>Format</b>	<b>Page</b>	<b>Comment</b>	<b>Response</b>
88	Terry Julesgard and Tammy Morrow-Julesgard	E-mail	1 of 2	As stated above I live along the Niobrara River. Less than one half mile from my house is a nesting pair of Bald Eagles with a young fledging along with other Eagles which hunt in the river below the house. Also during the winter months there are thousands of migratory birds which use the open water in the gravel pit to the south of the house and the river as night nesting areas. These birds travel out to the area fields during the day to feed; many of these fields are where the proposed wind turbines are to be located. It is a well know fact wind turbines and bird are not a good combination. Thus, this concern is twofold; I do not want the birds killed by the turbines, or to cause the birds to winter nest elsewhere because of the wind turbines.	Thank you for your comment.
89	Terry Julesgard and Tammy Morrow-Julesgard	E-mail	2 of 2	The Draft EIS states there will be little impact to the migratory birds but I did not see a detailed study on the impact to the birds which winter in the area of the proposed project. Before Grande Prairie Wind Farm is allowed to continue a detailed study needs to be completed on the effect of the project to the native Eagle population and winter nesting of the migratory bird population.	Thank you for your comment. Sections 4.7.1.3 and 4.7.1.4 address impacts to birds and eagles.
90	Terry Julesgard and Tammy Morrow-Julesgard	E-mail	2 of 2	My third objection is purely personal, with that said in politics if one person feels that way there are at least 100 or more who think that way. Wind turbines are eye and noise pollution in its highest form. I have traveled through many areas which have hundreds and even thousands of wind turbines, many of those areas before and after the installation of wind turbines. Even the most desolate areas of Wyoming have lost their beauty because of wind turbines. I travel highway 12 regularly between Butte and Highway 81, instead of seeing the lush rolling hills and fields all one sees by day are ugly white spinning giants or an expanse of red flashing lights by night. My wife and I picked the place where we live now very carefully, we want to see nature and its beauty from my front or rear deck and when we travel to work or for shopping. This project is going to take one of the most beautiful drives in Nebraska and turn it into a waste land of ugly white spinning giants. As for the noise I hope I am far enough away so I do not hear the continues whooshing of the turbines blades. But, because of my work I do travel the area of the proposed project so I will no longer be able to stop and roll down the window to enjoy the sounds and beauty of the area. For these reasons we stand opposed to the Grande Prairie Wind Farm and respectfully request the project be reconsidered or relocated for lack of a better suggestion to Kansas.	Thank you for your comment.

**Section 2 – Individual Comments Arranged by Comment Number**

1

Hi Terry,

Please log in a phone comment on the wind farm 6-26-14 at 10:10 a.m. MDT from Mr. Rod Thomas of Norfolk, NE. Rod's comment is that he is very supportive of the wind project and hopes the project goes well. He is very supportive of renewable energy projects. Thanks.

Matt

Matt Marsh

UGP Environmental Manager

Western Area Power Administration

2900 4th Avenue North, 6th Floor

Billings, MT 59101-1266

406-255-2811 office

406-697-9824 cell



QBE  
NAU

July 1, 2014.

I am in favor of  
this project to move  
forward as it will  
furnish ~~for~~ people with  
clean energy.

Earl R Miller  
Land owner.

Visit us at [naucountry.com](http://naucountry.com)

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GRANDE PRAIRIE WIND FARM  
ENVIRONMENTAL IMPACT STATEMENT

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Hearing held in O'Neill, Holt County, Nebraska  
O'Neill Community Center  
July 1, 2014 - 5:15 p.m.

Hearing Officer: Mr. Gary Hoffman

1	<u>SPEAKERS</u>	<u>PAGE:</u>
2	Ms. Lory Storm	13, 17
3	Ms. Barb Otto	16
4	Ms. Amy Shane	17
5	Mr. Mike Zakrczewski	18
6	Mr. Boyd Strobe	21
7	Mr. Marv Fritz	22
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1           HEARING OFFICER: My name is Gary Hoffman  
2 and I'm an attorney with the Western Area Power  
3 Administration's Office of General Counsel. I'm  
4 located out of Lakewood, Colorado, which is just  
5 outside of Denver. I'll be the hearing officer for  
6 tonight's public hearing, and just for the record,  
7 it's being held here at the O'Neill Community Center  
8 in O'Neill, Nebraska.

9           The purpose of this evening's hearing is to  
10 receive formal, oral comments on the draft  
11 environmental impact statement for the Grande Prairie  
12 Wind Farm Project, and I'm going to refer to that as  
13 the project so I don't keep saying the name over and  
14 over.

15           Western Area Power Administration is an  
16 agency within the Department of Energy, and I'm going  
17 to refer to it as Western for short.

18           The project proponent, or applicant, has  
19 requested permission to interconnect to Western's  
20 transmission line. Western, as a federal agency, has  
21 determined that a review under the National  
22 Environmental Policy Act, which you may have heard of  
23 as NEPA, is required. Specifically, the review  
24 that's being done is an environmental impact  
25 statement. You'll hear that referred to as an EIS.

1           The interconnection request was made by  
2 Grande Prairie Wind, LLC. Grande Prairie Wind, LLC,  
3 is a subsidiary of Geronimo Wind Energy, LLC, doing  
4 business as Geronimo Energy. I'm going to refer to  
5 Grande Prairie Wind and Geronimo Energy as the  
6 project proponent or the applicant.

7           This part of the formal hearing, where we're  
8 on record with the court reporter taking our words  
9 down word for word, is not a question and answer  
10 forum. Prior to the start of the meeting we had  
11 several representatives from Grande Prairie Wind and  
12 also Geronimo Energy, and Western Area Power  
13 Administration, and then there was a consulting  
14 company that's present tonight, Stantec Consulting  
15 Services; they're the consultant that was hired in  
16 conjunction with the preparation of the EIS. Those  
17 individuals were here to discuss things with you.  
18 There are some of the posters back there, some maps;  
19 those people are going to be around after the formal  
20 part of this public hearing if you do have questions.

21           I'm going to go ahead and introduce those  
22 people; you probably may have already met them, but  
23 we have Rod O'Sullivan, he's over to your left, he's  
24 raising his hand, he's from Western Area Power  
25 Administration, he's the NEPA document manager.

1           Micah Reuber is all the way in the back to  
2 your left, he's an environmental protection  
3 specialist with Western also.

4           And I hope I have the right pronunciation of  
5 the individuals here from Geronimo Energy; is Ingrid  
6 Schwingler here? Yes. I got the name right. Thank  
7 you. She is the permitting specialist.

8           Patrick Dalseth, to your right, project  
9 manager; Tim Polz, front and center, is  
10 vice-president; and is Jeremy Duehr here also?  
11 Jeremy is the attorney with Fredrikson & Byron,  
12 they're counsel for Geronimo Energy.

13           Last but not least, Stantec Consulting  
14 Services, Terry VanDeWalle?

15           MS. MOLLY GILLESPIE: Actually, it's me,  
16 Molly Gillespie.

17           HEARING OFFICER: So I apologize, I got one  
18 name wrong.

19           So these individuals will be present after  
20 the formal part of this hearing if you do have  
21 questions.

22           The applicant proposes to construct, own,  
23 operate and maintain a commercial, utility-scale wind  
24 energy generation facility near O'Neill, here in Holt  
25 County.

1           At full build-out, the proposed project  
2 would include up to 266 wind turbines with a combined  
3 generating capacity of up to 400 megawatts of  
4 renewable energy.

5           There would be between 40 and 60 miles of  
6 access roads built; approximately 30 to 50 miles of  
7 existing roads would be upgraded; there would be  
8 construction of temporary crane paths during the  
9 construction period of the wind farm; there would be  
10 between a hundred and a hundred and fifty miles of  
11 trenched underground power collection lines.

12           There would also be a 12-to-15 mile  
13 aboveground generation-tie, sometimes referred to as  
14 a gen-tie line; two collector substations; one  
15 interconnection substation; six or more  
16 meteorological towers, those would be permanent;  
17 there would be some temporary meteorological towers;  
18 and then there would be an operation and maintenance  
19 building approximately 2,000 to 5,000 square feet  
20 that would exist or sit on a lot of about 10 to 20  
21 acres.

22           The applicant proposes to build this project  
23 in order to meet the growing demand for energy  
24 production from clean, environmentally-friendly,  
25 renewable resources. The wind farm would be located

1 on approximately 54,000 acres -- and again, that's  
2 northeast of O'Neill, and would be located on private  
3 and public crop land and pasture land.

4 The life of the project is anticipated to be  
5 a minimum of 20 years. The project does have a  
6 purchase power agreement with Omaha Public Power  
7 District for the entire output. The commercial  
8 operation date is anticipated by the end 2015.

9 There would be a point of interconnection  
10 with Western's transmission line, specifically  
11 Western's 345 kilowatt or -- I'm sorry, kilovolt, or  
12 KV, Fort Thompson to Grand Island transmission line.  
13 And that connection would be through a new  
14 constructed switchyard.

15 That switchyard would be constructed, owned  
16 and operated by Western, and that's approximately  
17 seven miles east of O'Neill, where that's  
18 anticipated.

19 There were two alternatives analyzed in the  
20 draft EIS: There's the proposed build alternative,  
21 and then there's what we call a no-action  
22 alternative. The no-action alternative is where the  
23 project would not be constructed, would not be built.

24 Within the build alternative, the applicant  
25 has considered use of different-sized wind turbine --

1 or different types of wind turbine generator types.  
2 Those range from one-and-a-half megawatts each, up to  
3 three megawatts each. Those would vary in height and  
4 rotor diameter, depending on whether it was the  
5 smaller or the larger of the range. If they use the  
6 larger turbines, there would be less than the total  
7 266 turbines.

8           Also within the build alternative, the  
9 applicants identified 53 alternative turbine  
10 locations, in case some of the primary or initial  
11 locations don't work out for any number of reasons.

12           Again, the applicant has applied for a  
13 generation interconnection to Western's transmission  
14 system. Western has what's called an Open-Access  
15 Transmission Tariff, and under that tariff, Western  
16 must consider requests for access or interconnection  
17 to that transmission system if capacity's available.

18           Again, since Western's a federal agency,  
19 Western determined NEPA did apply and determined the  
20 environmental impact statement was the proper level  
21 of review for the project. The purpose of this  
22 hearing this evening is to receive comments from the  
23 public on that draft EIS.

24           Western, again, needs to determine whether  
25 to grant that interconnection request. If it grants

1 it, there would be an interconnection contract or  
2 agreement that would be signed between the applicant  
3 and Western.

4 Western has to consider that request  
5 pursuant to its existing policies, regulations, and  
6 laws. Additionally, Western has to determine whether  
7 to construct the new switchyard that would be, again,  
8 on that Fort Thompson to Grand Island 345 KV  
9 transmission line.

10 We do appreciate your having signed the  
11 sign-up sheets as you entered the room this evening.  
12 If you haven't signed yet, we'd ask that you do so on  
13 the way out.

14 Again, this isn't the time to ask me or the  
15 other representatives questions; we will take your  
16 comments.

17 So tonight we'll take the oral comments.  
18 There are other ways for you to make comments: If  
19 you happen to have a written statement with you, you  
20 can leave that with the court reporter.

21 There are two other ways that you can  
22 provide comments during the comment period. We are  
23 under the comment period right now; it started from  
24 the notice of availability of the draft EIS, which  
25 was published -- I think it was the 20th of May, if I

1 have that correct, and that comment period runs  
2 through August 4th of this year, 2014.

3 So, if Western -- we receive your comments  
4 by August 4th, they will be considered in the final  
5 environmental impact statement.

6 Again, tonight you can give us oral  
7 comments; if you have written comments, you can  
8 provide those. If you'd rather provide written  
9 comments later, there are two different ways you can  
10 do it: One is through an e-mail address that I'll  
11 give you in a minute, and another one is by using  
12 regular U.S. mail, just sending a written comment.

13 There were some comment sheets provided in  
14 the back of the room and we've got some more over  
15 here to your right. You're welcome to take those  
16 with you; if you want to fill one out tonight you can  
17 and leave it here, or you can take it with you and  
18 mail it. It does have a mailing address on the back  
19 for Rod O'Sullivan, the document manager, Western  
20 Area Power Administration, our corporate services  
21 office, P.O. Box 281213, Lakewood, Colorado,  
22 80228-8213.

23 Matt Marsh is also identified, is he also  
24 taking those comments?

25 MR. O'SULLIVAN: He is, yes.

1           HEARING OFFICER:  So Matt Marsh is an  
2 environmental protection specialist with Western in  
3 our Upper Great Plains office, which is in Billings,  
4 and I have his address -- I'll also read that, but if  
5 you want that address, too, you're welcome to get it  
6 from me after we're done here this evening.

7           That address is 2900 Fourth Avenue North,  
8 P.O. Box 35800, Billings, Montana, 59107-5800.

9           The e-mail address for Mr. Marsh is  
10 mmarsh -- so M Marsh -- @wapa -- W-A-P-A -- dot gov.

11           I do have a phone number for Marsh; again,  
12 you can't call him and give him a comment to put in  
13 the formal documents, but if you have questions you  
14 can call him, and his phone number is 406-255-2811.

15           As I mentioned, we do have a court reporter  
16 here, Kami Hooey.  I don't have her address handy,  
17 but we can get that afterwards.  If you decide you  
18 would like a written transcript of tonight's hearing  
19 you can contact Mr. Marsh or you can get ahold of  
20 Mr. O'Sullivan and they'll arrange that for you.

21           All the substantive comments that we receive  
22 this evening and throughout the rest of the public  
23 comment period will be addressed in the final  
24 environmental impact statement.

25           The comments that you all provide to Western

1 assist the decision maker, which is Western, by  
2 identifying the concerns and the values of all  
3 interested parties. At the end of the expiration of  
4 the public comment period, a final environmental  
5 impact statement will be prepared. It is anticipated  
6 that the final EIS will be issued in the late -- this  
7 late summer, or early fall of this year, 2014.

8           Following the issuance of that final  
9 environmental impact statement, it is filed with the  
10 U.S. Environmental Protection Agency. And there's a  
11 requirement for a 30-day waiting period after that's  
12 filed before Western makes its decision.

13           Again, the decisions to be made by Western  
14 are actually two, but they go together, and one is  
15 whether to grant the interconnection request, and  
16 along with that, build the switchyard so that -- to  
17 facilitate that actual physical interconnection.

18           Western's decision will be issued in the  
19 form of what we refer to as a record of decision, and  
20 it's anticipated that record of decision would be  
21 made in the late fall of 2014.

22           We're ready now for anyone who would like to  
23 give comments. We've got a microphone we can hand to  
24 you. I would request that you say your name and then  
25 spell your name for the court reporter so she gets it

1 correct.

2 Any speakers? Any commenters?

3 Yes, ma'am.

4 MS. LORY STORM: Do I need to come up to the  
5 mike or --

6 HEARING OFFICER: That would be best, so she  
7 can hear, if you could, or would you rather have the  
8 microphone brought to you?

9 MS. LORY STORM: Well, I want to read the  
10 sources, so I have them --

11 HEARING OFFICER: You're welcome to do it  
12 however is comfortable for you.

13 MS. LORY STORM: These are comments, not  
14 questions, right?

15 HEARING OFFICER: That is correct.

16 MS. LORY STORM: Okay. According to the  
17 U.S. Energy Information Administration --

18 HEARING OFFICER: Excuse me. If you could  
19 introduce yourself and spell your name for the court  
20 reporter, then we'll know who made the comment.

21 MS. LORY STORM: My name is Lory Storm,  
22 spelled L-O-R-Y, S-T-O-R-M.

23 According to the U.S. Energy Information  
24 Administration, the cost of wind subsidies are still  
25 up at \$52.48 per one million megawatt hours

1 generated. Now, contrast that with the amount of  
2 electricity from coal, or -- yeah, from coal, is 64  
3 cents, natural gas 63 cents, and hydropower is 84  
4 cents. So it is still 52 times more subsidized than  
5 any other form of energy in the country, which means  
6 any lease you pay our power to generate, basically  
7 paid for by the American taxpayer and not by the  
8 energy you generate. I guess I have a problem with  
9 that.

4 10 The cost to taxpayers is only part of the  
11 problem. That wind energy subsidy is allowing wind  
12 energy to literally force itself on the market. In  
13 many areas in the Midwest and in Texas, wind energy  
14 companies are paying power companies to use their  
15 energy, which then displaces other forms of energy we  
16 can create for 150th of the cost, which I have a  
17 serious problem with interrupting Avista for wind  
18 energy that's paid for by the taxpayers. We could  
19 all sit on our exercise bikes once a day and generate  
20 energy and it will cost us less money.

5 21 It's still far less economically feasible.  
22 In fact, Steven Chu, who is the energy secretary who  
23 likes wind energy, has recently admitted in a paper  
24 that wind energy is a mature technology, but costs 12  
25 times more today to produce than it did in 1994 when

1 we started the subsidies. The entire issue of the  
2 subsidies was to put wind energy on the market and  
3 make it viable so that technology could make it  
4 cheaper. We've made it 12 times more expensive by  
5 putting it on the government door.

6 The other issue is it piqued demand energy.  
7 Chicago gets 30 percent of its power from wind energy  
8 these days, and in 2009 they had -- what was it, 92  
9 days where they got zero energy, and 236 other days  
10 that -- the point was at the end of the year, the  
11 wind generators had a 99.8 percent failure rate at  
12 providing them the necessary power, even simply based  
13 on the contract of the 28 percent of the power it was  
14 supposed to provide. It didn't do that 99.8 percent  
15 of the time.

7 The other issue is you're doing an  
17 environmental impact study on the environmental  
18 impact to the U.S., but the 800 pounds of rare earth  
19 minerals that will go into each of those turbines, 95  
20 percent of which are mined in China, which has no  
21 environmental laws, and a recent paper by MIT has  
22 proven that for every pound of radioactive -- or of  
23 rare earth mineral China mines, they create a pound  
24 of radioactive acidic waste, which means that last  
25 year in this country, the wind energy sector produced

1 more radioactive waste on the globe than the nuclear  
2 energy sector did.

3 And it's not being stored in secure, safe  
4 facilities like the U.S. nuclear waste is, it's being  
5 dumped in a lake in China.

6 Those are my comments.

7 HEARING OFFICER: Thank you for your  
8 comments.

9 Anyone else that would like to give a  
10 comment, please raise your hand, we'll get a  
11 microphone to you.

12 And again, if you would state your name and  
13 spell it for the court reporter.

14 MS. BARB OTTO: My name is Barb Otto,  
15 O-T-T-O.

16 You know, we get all hung up on these  
17 environmental sites and impact statements and the  
18 endless environmental drain thing that's being shoved  
19 down our throat constantly. Why is it that it's a  
20 \$10,000 fine to kill a bald eagle, but if we find a  
21 turbine -- or a wind generator and chop them into a  
22 thousand pieces, I -- I always so question all the  
23 importance of these environmental hang-ups that the  
24 government seems to have as long as it's convenient  
25 for their purposes.

1 Thank you.

2 HEARING OFFICER: Thank you for your  
3 comment. If we have others, if you can indicate by  
4 raising your hand, we'll get a microphone to you.  
5 We've got a lady in the back.

6 MS. AMY SHANE: My name is Amy Shane, A-M-Y,  
7 S-H-A-N-E. And I just wanted to point out that  
8 the -- the taxpayers will have some tax relief based  
9 on taxes generated through the nameplate tax, and  
10 that would certainly be welcome property tax relief  
11 in this area. So that is a positive in relation to  
12 this project.

13 HEARING OFFICER: Thank you. Others, if  
14 you'd indicate by raising your hand if you'd like to  
15 comment. We've got time if you want to make some  
16 more comments. We welcome all public comments and  
17 all opinions.

18 MS. LORY STORM: We have several counties in  
19 Nebraska that have put up wind generators, and the  
20 average savings for property taxpayers versus the  
21 federal and state and local subsidies paid to the  
22 windmills equals a negative rate for taxpayers of  
23 over 70 percent in each and every case.

24 The numbers are there. All you have to do  
25 is the math.

1           So there isn't going to be any real property  
2 tax relief for the majority of citizens, only for a  
3 select few; and even then, when they factor in the  
4 state and local and federal taxes they pay to the  
5 subsidies, there is no savings. There's still no  
6 water.

7           HEARING OFFICER: Do we have others that  
8 would like to comment?

9           Where we are right now, it's approximately  
10 5:40. We had indicated we'd be here for a little  
11 while longer. What I'm going to announce what I'm  
12 going to do, and that is that we're going to take  
13 about a five- to ten-minute break, going off the  
14 record, and I'll go back on the record; if any of you  
15 have decided you'd like to make a comment, you're  
16 welcome to do so.

17           We have someone else that would right now;  
18 we'll go ahead and do that one first. If you'd,  
19 again, state your name and spell it for the court  
20 reporter.

21           MR. MIKE ZAKRCZEWSKI: Yes, my name is Mike  
22 Zakrczewski, M-I-K-E, Z-A-K-R-C-Z-E-W-S-K-I.

23           I'm a landowner within the project area, and  
24 we have a substantial representation of fellow  
25 landowners here who would like to express our full

1 support for the project. We feel that it is very  
2 environmentally friendly; we feel that it is a  
3 cost-effective source of energy, and obviously OPPD  
4 agreed with that assessment.

5 And if I could, could I just get a show of  
6 hands of fellow landowners who do support the  
7 project.

8 (Indicating.)

9 We have also encountered overwhelming  
10 support from the community at large for this project.

11 And so that's my comment.

12 HEARING OFFICER: Thank you. If there's --  
13 if there are others that would like to speak before  
14 the break, we'll do that. I am planning on still  
15 taking a ten-minute break and going back on the  
16 record to see if anyone else wants to provide  
17 comments for this.

18 Not seeing any indication of anyone wanting  
19 to comment before the break, we'll go ahead and take  
20 a ten-minute break. So you should be back  
21 approximately ten until 6.

22 Thank you.

23 (A break was taken at 5:40 p.m.  
24 and proceedings resumed at 5:58  
p.m.)

25 HEARING OFFICER: If all of you could gather

1 back around, we're going to go back on the record for  
2 a few minutes if anyone else wants to give a comment.

3 We're back on the record here. It's five  
4 until 6 o'clock central time, and we've just taken a  
5 little over -- approximately a 15-minute break.

6 I wanted to give an opportunity to any  
7 others who have not had an opportunity to comment  
8 orally, to do that. And if you'd like to do that, if  
9 you could go ahead and raise your hand, we'll take  
10 your comment.

11 I think there were a few people that came in  
12 while we were taking our break, and again, the  
13 purpose of this evening's public hearing, the portion  
14 we're in now, is to take oral comments from the  
15 public to be considered; substantive comments will be  
16 addressed in the final environmental impact statement  
17 and a decision to be made -- yet to be made by  
18 Western on the project.

19 So that's why we are here. If anyone would  
20 like to give an oral comment, we've got the court  
21 reporter here. We did take approximately four  
22 comments and one -- oral comments and one written  
23 comment.

24 Would anyone else like to give an oral  
25 comment this evening? I don't see anyone else's

1 hand.

2 I do see someone else. We've got the  
3 microphone up front, and again, I'd remind you, if  
4 you could state your name and spell your name for the  
5 court reporter, that would be helpful to her.

6 MR. BOYD STROPE: Good evening, I'm Boyd  
7 Strobe, S-T-R-O-P-E, from O'Neill, Nebraska, and I  
8 have no problem with the environmental impact of this  
9 project.

10 And I think we have many community leaders  
11 here, too, and if they wished, by show of hands, they  
12 do not have any objection to the environmental aspect  
13 of this coming into the community; and all the  
14 community leaders that support it, if I could,  
15 please.

16 (Indicating.)

17 I think we had landowners before, but I  
18 wanted to see if there was community support also.

19 Thank you.

20 HEARING OFFICER: Thank you. Again, this is  
21 your chance to give oral comments. As soon as I  
22 close the hearing, we'll be done with that, so I  
23 wanted to make sure anyone that wanted the  
24 opportunity to give an oral comment to do that.

25 We do have another person; if you could come

1 up, sir.

2 MR. MARV FRITZ: Marv Fritz, M-A-R-V,  
3 F-R-I-T-Z.

4 I'm not going to sound very organized  
5 because I haven't done a lot of work on this for a  
6 couple of years, but most of -- the numbers that the  
7 lady gave before, that's way out of what -- whack of  
8 what I've heard.

9 If the cost is 4, 5 or 6 cents, most of the  
10 other generations that our other greenhouses' -- for  
11 the company that I now work for -- electricity is 7,  
12 8, 9, 10 cents a kilowatt hour, and the wind turbines  
13 don't need any subsidy to make it work very well  
14 under that set of circumstances, but --

15 And the government has decided that for  
16 whatever reason -- I don't think anybody's arguing  
17 that there's climate change, it just amazes me that  
18 we think we can do something about it.

19 But nevertheless, they think they can, so  
20 they're going to make our electricity -- which we're  
21 used to dirt cheap stuff in Nebraska -- a lot more  
22 expensive. So even if they're not maybe able to  
23 operate with as cheap as the old coal that we have  
24 now, it won't be very much longer, the way things are  
25 going, and they should be able to operate without

1 subsidies.

15

2           And as someone that's put my whole life and  
3 everything that I've ever done in my life invested  
4 into this community, it's -- I've said this before.  
5 I mean, it's not 1950, it's never going to be 1950.  
6 Not everything is going to work, but we've got to  
7 keep trying things and doing good things or we get  
8 stagnant. We were the -- we had the dubious  
9 distinction of losing more population than any county  
10 in the state of Nebraska when I moved to this  
11 community 12 years ago. I think we've -- Nikki can  
12 correct me, I guess, but I think we've at least  
13 arrested that, and it's projects like this that are  
14 going to help us turn around and push that back  
15 another direction.

16           Thank you.

17           HEARING OFFICER: Thank you for your  
18 comment.

19           Do we have any others that would like to  
20 comment? If you could raise your hand, we'll  
21 recognize you.

22           The ad that was placed in the paper said  
23 that we would be here for another hour. We are going  
24 to stay here for another hour. Anyone that wants to  
25 have questions answered, the representatives will be

1 here.

2 I'm going to close the public comment part  
3 of tonight's hearing. Should anyone that wasn't  
4 here, isn't here now that come in later, in the next  
5 hour, and decide they want to go on, I will reopen  
6 the comment hearing for them.

7 Before I close here now, I did want to  
8 remind you that you have until August 4th, 2014; that  
9 means the postmark, if you send a letter, has to be  
10 August 4th; if you send an e-mail, you have to do it  
11 by August 4th.

12 We've provided for you -- again, I'm going  
13 to reference this form that's in the back of the room  
14 that you can take with you. You don't have to use  
15 that to write your comment. You can write a shorter  
16 comment, a longer comment, but I'd encourage you to  
17 take that, because it does have the address where the  
18 comment goes.

19 If you'd like the e-mail address that I  
20 have, please approach me here in a few minutes and  
21 I'll be able to give that to you; it's within the  
22 text of the oral comments I gave earlier.

23 So at this time, if anyone else would like  
24 to give an oral comment, we'll go ahead and recognize  
25 you, otherwise we're going to go ahead and close the

1 hearing. And again, it won't be reopened unless  
2 somebody new comes in and decides they would like to  
3 give a comment.

4 I want to thank you all for coming this  
5 evening. Again, it's your comments that help the  
6 decision maker, Western, make their decision on  
7 whether to allow the interconnection and to build the  
8 switchyard, and that decision is made after reviewing  
9 the environmental impact statement and all the  
10 substantive comments that have been made or will have  
11 been made by August 4th to that.

12 Again, thank you for coming, and I apologize  
13 for having been 15 minutes late.

14 Thanks.

15 (Hearing concluded at 6:03 p.m.)  
16  
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23  
24  
25

**From:** Nicole Sedlacek [<mailto:nicole@growtholt.com>]  
**Sent:** Tuesday, July 01, 2014 5:50 PM  
**To:** Marsh, Matthew  
**Subject:** Grande Prairie Wind

Dear Mr. Marsh,

16 I would like to have my comments on the record for the Interconnection of the Grande Prairie Wind Farm project in Holt County, Nebraska.

Holt County Economic Development Agency has no issues at all with the environmental impact statement regarding this proposed project. HCED believes this project has the potential to be a huge game changer for rural Nebraska in regards to the positive economic impact a project this size could have on our county and absolutely no negative impact, environmentally.

Sincerely,

Nicole Sedlacek, Executive Director  
Holt County Economic Development  
O'Neill, Nebraska  
(402) 336-1504 (office/fax)  
[www.holtcountynebraska.com](http://www.holtcountynebraska.com)



**Grande Prairie Wind Farm Open House  
 July 1, 2014, 5-8 PM, O'Neill Community Center  
 Public Hearing  
 Environmental Impact Statement (EIS)**

Thank you for your interest in the Grande Prairie Wind Farm EIS. After reviewing all of the exhibits and speaking with project representatives, please complete the appropriate sections of this form to be included on the EIS mailing list and/or to provide comments. Written comments can be submitted at the hearing, mailed to Mr. Rod O'Sullivan, Document Manager, Western Area Power Administration, P.O. Box 281213 Lakewood CO 80228-8213 or e-mailed to **grandeprairie@wapa.gov**. Your comments are important to us and will be accepted through **August 4, 2014** for formal consideration in the hearing process.

**Please Print Contact Information Below**

<u>Name:</u> Dennis Sanne	<u>Organization:</u> CORE Development Inc
<u>E-mail Address:</u> dennissanne@nntc.net	<u>Daytime Phone No. (optional):</u> 402-649-7613
<u>Street Address:</u> 84668 514 Ave	<u>City / State / Zip Code:</u> Clearwater Ne 68726

- Please e-mail me the web link to the Draft EIS. (Quickest and Preferred method)
- I would like a paper copy of the Draft EIS.
- I would like a Compact Disk (CD) of the Draft EIS.
- I do not need a copy of the Draft EIS.

**Please Share Comments, Questions, or Concerns Below (continue on separate sheet if necessary)**

17 We are a 6 Town developent organization with 3 Towns located in Holt Co. Our organization supports this wind farm project as we recognize The economic impact it can have on our rural Community. We recognize there may be a minor environmental impact, but it is imposs.ble not to affect the environment in some way with anything man does.

Thank you for your time and interest.



**Grande Prairie Wind Farm Open House  
 July 1, 2014, 5-8 PM, O'Neill Community Center  
 Public Hearing  
 Environmental Impact Statement (EIS)**

Thank you for your interest in the Grande Prairie Wind Farm EIS. After reviewing all of the exhibits and speaking with project representatives, please complete the appropriate sections of this form to be included on the EIS mailing list and/or to provide comments. Written comments can be submitted at the hearing, mailed to Mr. Rod O'Sullivan, Document Manager, Western Area Power Administration, P.O. Box 281213 Lakewood CO 80228-8213 or e-mailed to [grandeprairie@wapa.gov](mailto:grandeprairie@wapa.gov). Your comments are important to us and will be accepted through **August 4, 2014** for formal consideration in the hearing process.

*Please Print Contact Information Below*

<u>Name:</u> Bruce Cole	<u>Organization:</u>
<u>E-mail Address:</u>	<u>Daytime Phone No. (optional):</u> 402-336-1689
<u>Street Address:</u> 50824 882 Rd	<u>City / State / Zip Code:</u> O'Neill, NE 68763

- Please e-mail me the web link to the Draft EIS. (Quickest and Preferred method)
- I would like a paper copy of the Draft EIS.
- I would like a Compact Disk (CD) of the Draft EIS.
- I do not need a copy of the Draft EIS.

*Please Share Comments, Questions, or Concerns Below (continue on separate sheet if necessary)*

18 I am in favor of the Grande Prairie wind farms I am asking that you will do your part in helping this project happen. Thank you!

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Thank you for your time and interest.



**Grande Prairie Wind Farm Open House  
 July 1, 2014, 5-8 PM, O'Neill Community Center  
 Public Hearing  
 Environmental Impact Statement (EIS)**

Thank you for your interest in the Grande Prairie Wind Farm EIS. After reviewing all of the exhibits and speaking with project representatives, please complete the appropriate sections of this form to be included on the EIS mailing list and/or to provide comments. Written comments can be submitted at the hearing, mailed to Mr. Rod O'Sullivan, Document Manager, Western Area Power Administration, P.O. Box 281213 Lakewood CO 80228-8213 or e-mailed to [grandeprairie@wapa.gov](mailto:grandeprairie@wapa.gov). Your comments are important to us and will be accepted through **August 4, 2014** for formal consideration in the hearing process.

***Please Print Contact Information Below***

<u>Name:</u> <i>Claude &amp; Gladys Cole</i>	<u>Organization:</u>
<u>E-mail Address:</u>	<u>Daytime Phone No. (optional):</u> <i>402 - 336 - 1689</i>
<u>Street Address:</u> <i>50824-882 Rd.</i>	<u>City / State / Zip Code:</u> <i>O'Neill, NE 68763</i>

- Please e-mail me the web link to the Draft EIS. (Quickest and Preferred method)
- I would like a paper copy of the Draft EIS.
- I would like a Compact Disk (CD) of the Draft EIS.
- I do not need a copy of the Draft EIS.

***Please Share Comments, Questions, or Concerns Below (continue on separate sheet if necessary)***

19

*We are in favor of this wind farm & find no problems with any towers.*

*This is open country and we have plenty of wind & feel its a clean source of energy.*

*Wind is something we use but do not USE IT UP*

**Thank you for your time and interest.**



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

JUL 14 2014

Western Area Power Administration  
Upper Great Plains Region  
P.O. Box 35800  
Billings, MT 59107

Dear Mr. Marsh:

RE: Draft Environmental Impact Statement, Interconnection of the Grande Prairie Wind Farm, Holt County, Nebraska, June 2014 (CEQ# 20140171)

The U.S. Environmental Protection Agency has received and reviewed the Department of Energy's referenced Draft EIS pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

- 20 EPA agrees with Western's assessment that wind power has enormous benefits for the human environment, and we want to see this project move forward in as timely a manner as possible. After a thorough review, EPA has rated this DEIS as EC-2 (Environmental Concerns-Insufficient Information). A copy of EPA's rating definitions is enclosed. The EC-2 rating is based on several concerns raised from the DEIS having no alternatives for the decision maker or public to choose from.
- 21 This DEIS has only the proposed alternative and a no build alternative. This is inconsistent with 40 C.F.R. 1502.14 "Alternatives Including the Proposed Action." EPA believes it is reasonable to assume many alternatives have been considered and eliminated during the NEPA process, but were excluded by DOE for unknown reasons; EPA recommends including other alternatives based on site locations considered, types of energy considered, and types of wind turbines considered (conventional and unconventional).
- 22 Given the number of bird and bat strikes from conventional wind turbines, were there any considerations to unconventional wind turbines? If so, why were they discarded as alternatives? What, if any, considerations were given to the use of a turbine that minimizes bird/bat strikes? EPA recommends including answers to these questions in the Final EIS to better inform both the public and decision maker.
- 23 The DEIS also states on several different occasions that land owners may be willing to waive the minimum ½ mile rule for wind turbines. Could Western work with those residents and the energy supplier to invest in smaller or unconventional turbine systems, especially given that residents may not fully understand the long-term health and aesthetic issues associated with conventional three-bladed horizontal-axis wind turbines? EPA recommends including answers to these questions in the Final EIS to better inform both the public and decision maker.



- 24 Although the area selected in Holt County, Nebraska might be the best spot for a new wind farm, what other sites were considered and why were those sites not selected? EPA recommends including at least one other site that was studied and why it was eliminated as an alternative in the Final EIS.

EPA appreciates the opportunity to provide comments regarding this project. If you have any questions regarding this letter, please contact me at 913-551-7029 or at [summerlin.joe@epa.gov](mailto:summerlin.joe@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to be 'JS', written over a circular stamp or seal.

Joe Summerlin  
Environmental Review Coordinator on Energy

Enclosure

According to 40 C.F.R. 1502.14, “Alternatives Including the Proposed Action”:

*This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (§ 1502.15) and the Environmental Consequences (§ 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. In this section agencies shall:*

- (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, and briefly discuss the reasons for their having been eliminated.*
- (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.*
- (c) Include reasonable alternatives not within the jurisdiction of the lead agency.*
- (d) Include the alternative of no action.*
- (e) Identify the agency’s preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.*
- (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.*

### **Environmental Impact Statement Rating System Criteria**

EPA has developed a set of criteria for rating draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft EIS.

- Rating the Environmental Impact of the Action
- Rating the Adequacy of the Draft Environmental Impact Statement (EIS)

### **RATING THE ENVIRONMENTAL IMPACT OF THE ACTION**

- **LO (Lack of Objections)** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- **EC (Environmental Concerns)** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- **EO (Environmental Objections)** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may

require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. *Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;*
  2. *Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;*
  3. *Where there is a violation of an EPA policy declaration;*
  4. *Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or*
  5. *Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.*
- **EU (Environmentally Unsatisfactory)** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
    1. *The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;*
    2. *There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or*
    3. *The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.*

### **RATING THE ADEQUACY OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT**

1. **(Adequate)** The draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
2. **(Insufficient Information)** The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

3. **(Inadequate)** The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.

23 July 2014

Dear Sir,

25

The Grande Prairie Wind Farm proposed for Holt County nebr is a dumb idea. It needs to be stopped in its tracks. How many birds have to die for this project and how many cancer cases will this project cause. Stop it before it starts. We need pipelines not turbines!

Harold L Frickel

87796 SH 11

Atkinson, ne 68713

From: Maurice Koenig [maurice.koenig@asihiyield.com]  
Sent: Thursday, July 24, 2014 12:53 PM  
To: Marsh, Matthew  
Subject: Grande Prairie Wind Farm Comments

Mr. Matt Marsh:

- 26 I am sending this e-mail in support of the Grand Prairie Wind Farm project. I am one of three Directors and Vice President/Secretary of Agricultural Services Inc., a fertilizer and chemical retail company providing custom application services in central Nebraska with operations within and surrounding this wind farm project area. We have two retail plants in Holt County where this project is located and five retail plants located in Grand Island and four other communities surrounding Grand Island. Our corporate office is located in Grand Island, Nebraska. In addition to the retail business, our company operates a 1600 acre farm within the Grande Prairie Wind Farm project area. I am also a past president of the O'Neill Area Chamber of Commerce and served on the Chamber Board for 9 years.
- 27 We strongly support the construction and operation of this project as it will have a substantial positive economic impact on our local economy for many years into the future. I am 61 years young, so obviously this project will not have a huge impact on me personally through the rest of my business career. However, we are a 100% employee owned company (ESOP Company) with approximately 85 full time employees and 30 part time employees. This project would have a substantial positive effect on our employee owners and our community for many years into the future.
- 28 Since O'Neill is not located on a major interstate highway or a major rail line it is difficult for our community to participate in many business growth opportunities compared to communities that are strategically located near those transportation networks. However, we are located adjacent to a very good connection point to the national power grid through the WAPA transmission line adjacent to the proposed wind farm. The wind/electricity generation industry can coexist very well with our local agricultural industry consisting of crop production, beef production, and pork production. The added tax base is a substantial benefit to our entire county, and not just the people in the project area. There are not many opportunities on the horizon like this one to take advantage of for the benefit of the entire area.
- 29 We strongly recommend that you approve this project as it is environmentally friendly and economically friendly at the same time.

Thank you for the responsibility you take in your position as Environmental Protection Specialist and for your consideration of our recommendations.

Sincerely,

Maurice Koenig  
Agricultural Services Inc.  
87313 Highway 281  
O'Neill, Nebraska 68763  
402-336-3045

**From:** Green, Ryan [<mailto:ryan.green@nebraska.gov>]  
**Sent:** Thursday, June 26, 2014 10:05 AM  
**To:** Marsh, Matthew  
**Subject:** NDEQ NEPA Review - Grande Prairie Wind Farm, Holt County, NE

26 May 2014

Department of Energy – Western Area Power Administration  
ATTN: Mr. Matt Marsh

RE: Interconnection of the Grande Prairie Wind Farm, Holt County, NE

Dear Mr. Marsh:

30 The Nebraska Department of Environmental Quality (NDEQ) has reviewed the above referenced project. As with any project, permits may be required prior to beginning construction or operation. At a minimum, you should be aware of the possible requirements or permits:

	<b>Contact</b>	<b>Phone</b>
Fugitive Dust Regulations	Ken Almquist	(402) 471-3387
Construction Storm Water – General Permit	Blayne Renner	(402) 471-8330
Water Quality Section 404 Permitting	Jason Garber	(402) 471-2875
Waste Disposal	Erik Waiss	(402) 471-8308

- Nebraska Title 129, Chapter 32 fugitive dust regulations will apply for all soil disturbances during construction.
- Authorization under the Construction Storm Water – General Permit will be required. Early and active participation in consultation with the Nebraska Game and Parks Commission will be necessary by project proponents to assure eligibility under the Construction Storm Water General Permit (CSW-GP) (Part I.C.3 and Part III F).
- The project proponent will need to consult with the U.S. Army Corps of Engineers and the NDEQ to ensure compliance with Section 404/401 of the Clean Water Act.
- Any solid or hazardous wastes generated or discovered during project operations must be properly handled, contained, disposed, and (if necessary) characterized, and follow all applicable regulations in Nebraska Title 128 and Title 132. When dealing with existing powerlines, be aware of possible polychlorinated biphenyl (PCBs) in old transformers.

If you have questions about the permitting process, or any other questions, feel free to contact me at (402) 471-8697, or the individual listed above. For more information, please visit our website at [deq.ne.gov](http://deq.ne.gov).

Sincerely,



**Ryan Green**

Small Business and Public Assistance (SBPA) Coordinator

Nebraska Department of Environmental Quality

Tel: 402.471.8697

E-mail: [ryan.green@nebraska.gov](mailto:ryan.green@nebraska.gov)



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Denver Federal Center, Building 67, Room 118  
Post Office Box 25007 (D-108)  
Denver, Colorado 80225-0007



July 28, 2014

9043.1  
ER 14/382

Mr. Matt Marsh  
Environmental Protection Specialist  
Western Area Power Administration  
Upper Great Plains Region  
P.O. Box 35800  
Billings, MT 59107-5800

Dear Mr Marsh:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Interconnection of the Grande Prairie Wind Farm, Holt County, Nebraska, and offers the following comments provided by the National Park Service (NPS) and U.S. Fish and Wildlife Service (USFWS) for your consideration.

## National Park Service Comments

31 The project has the potential to impact the visual resources of the Missouri National Recreation River and the Lewis and Clark National Historic Trail. Both parks expressed concerns at the Notice of Intent stage of the EIS process, and reviewed the visual analysis prepared for the EIS prior to its release. In addition, the visual analysis was reviewed by a Visual Resource Specialist in NPS's Denver-based Air Resources Division.

32 The methodology for the viewshed analysis seems sound and the target heights and 30 meter (m) data used are adequate. However, the viewshed analysis maps indicate the use of a 159 m (521 feet) tall target, which is the tallest potential turbine. The EIS notes the use of a 246.6 foot object (p. 4-133). This should be clarified as to which is correct. We also note that page 7 of the viewshed analysis has the color coding of visible/not visible turbines backwards.

The impact analysis methodology and conclusions are generally good and indicate that the project will be a dominant feature from some of the viewpoints. Previous visibility studies of wind farms in the west conclude that turbines could likely be a major focus of attention out to about 10 miles, and the wind farms included in the studies were generally smaller than the proposed project.

33 Most views from the Niobrara River should be obscured by terrain, but any visitors who access the high ground near the river would have a view dominated by the wind farm to the south. The viewshed analysis does indicate that many turbines will be visible from three different viewpoints along the Niobrara River. Two are located on the north side of the river (GPW-PT2 and 6) and one on the south side (GPW-PT 4) at a distance of approximately 7 miles or greater. It also appears there would be no visibility of turbines from the visitor center so the overall effects to the visitor experience should be minimal. Any visibility from the Lewis and Clark Trail (including the auto route) would be distant and the impacts minor. There do not appear to be effects to the views from the Missouri River, but if the project is visible from any high points, the increased distance should reduce the potential impacts.

#### USFWS General Comments

34 According to the document schedule discussed during meetings with Geronimo Energy and Western, their plan was to issue the FEIS late in the fall of 2014. In June, 2014, both an active and productive bald eagle nest, and the occurrence of American burying beetles at two locations were documented within the Grande Prairie (Project) boundaries. Given that there will likely be information or surveys needed relative to American burying beetle and bald eagle use of the site after the planned issuance of the FEIS, Geronimo Energy and Western should decide how to best proceed with addressing their responsibilities under NEPA and other federal statutes. Unanticipated avoidance and minimization measures will need to be developed for these species prior to issuance of the FEIS and final Biological Assessment (BA).

35 It would be helpful for the Final EIS to include the various survey reports of the site as Appendices to the document. This would be more convenient for the reader than repeatedly referring to Western's website to find pertinent information.

#### USFWS Specific Comments

- 36 1. **ES 3.2.4, Page ES-6:** How much heat will be generated by the 3 individual, 6-inch circuits rated at 34.5kW? If the heat is sufficient to keep the ground from freezing while the American burying beetles (ABB) are estivating, that would adversely affect any ABB within the thawed soil around the cables. Would the fiber optic cable also generate any heat?
- 37 2. **ES 3.2.7, Page ES-7/8:** If temporary met towers are up for one year, they will potentially affect two migrations of night-migrating songbirds. Take of night-migrating songbirds is likely at guyed temporary towers even when they are fitted with bird flight deflectors visible during the day. Ensure all obstruction lighting on permanent or temporary MET towers meets the new FAA recommendations. (New lighting requirements adopted by the FAA in late-2012 to reduce avian mortality from obstructions (<http://www.airporttech.tc.faa.gov/safety/downloads/TC-TN12-9.pdf>)). The USFWS recommends the proposed tower have the minimum number of pilot warning and obstruction avoidance lighting required by the Federal Aviation Authority (FAA). Unless otherwise required by the FAA, only white or red strobe lights should be used at night, and these should be the minimum number, minimum intensity authorized by the FAA,

and flash between 27 and 33 flashes per minute. Light emitting diodes (LED) lights are less expensive than incandescent lights and are more effective at reducing take of migratory birds. The use of constant red or pulsating (beacon) red warning lights at night should be avoided.

- 38 3. **ES 3.2.10, Page ES-9:** Change statement regarding seed mixture used for site reclamation to include participation by NGPC botanist, Gerry Steinauer, as discussed during the 6/25/14 conference call among all parties.
- 39 4. **ES 3.2.13, Page ES-10:** Project area characteristics and potential impacts to sensitive wildlife species from decommissioning activities taking place 20 to 40 years from now are difficult to assess at this time. Prior to decommissioning, the project proponent and Western should re-coordinate with the USFWS and the NGPC to discuss timing and other specifics of decommissioning activities which may affect wildlife and their habitats.
- 40 5. **Table ES-1, Pages ES 12/13:** Obviously, evidence of ABB and bald eagle occupation of the project site was not available when this section was written. Impacts to these species and procedures to be used to minimize take of these species during construction, operation and decommissioning need to be discussed. Additionally, the USFWS disagrees with the statement that construction and decommissioning of the wind development will result in a "... small acreage of anticipated disturbance...." Using several assumptions based on construction and facilities described in the DEIS, up to 5,107 acres (temporary disturbance of up to approximately 5,052 acres; permanent disturbance of up to approximately 95 acres) may occur during construction, with a similarly substantial but lower amount disturbed during decommissioning (Please see comment number 26), below). Both temporary and permanent surface and subsurface impacts can cause mortality of ABB in areas where ABB are found. Furthermore, there are several conclusions on this page stating that impacts to birds, threatened or endangered species, or eagles are not expected to be "significant." Any unauthorized mortality of migratory birds, threatened or endangered species, or eagles is unlawful under the MBTA, ESA and BGEPA, respectively.
- 41 6. **Table ES-1, Page ES-15.** Do the conclusions regarding noise and public health and safety include the effects to area residents from noise and strobe effects of turbines 1,200 feet from inhabited dwellings?
- 42 7. **Page 1-6:** The Endangered Species Act, Section 9, prohibits take (including death, harm or harassment) of any threatened or endangered species. For the purposes of evaluating potential impacts from the Grande Prairie project, Western has agreed to treat the proposed-for-listing northern long-eared bat as listed.
- 43 8. **Page 1-7, ESA, Section 9:** Typo- "listing" should be listed.
- 44 9. **Section 1.7, Page 1-13:** The USFWS suggests Western consider the issuance of a Supplemental DEIS prior to the final EIS, to allow public input regarding the discovery

of ABB and an active bald eagle nest on the project site subsequent to issuance of this DEIS.

- 45 10. **Section 2.2.1.6, Page 2-23:** see comment on section ES 3.2.7, Page ES-7/8, above.
- 46 11. **Section 2.2.2, Page 2-24/25:** As discussed during more than one meeting/conference call with Western and Geronimo, grassland restoration in the sandhills is problematic due to the extent of extremely erodible soils. Some Best Management Practices that are effective in other environments are less (or not) effective in the sandhills. As noted above, the project proponent should include input from the NGPC botanist when determining choice of seed mixes used for restoration of grasslands to avoid use of grass cultivars that become invasive. Additionally, a section should be included in the FEIS describing measures to be taken by Geronimo Energy should grassland restoration fail at one or more locations on the Grande Prairie site. Such discussion should include a discussion of parameters constituting restoration failure.
- 47 12. **Section 2.2.3.1, Page 2-25:** The USFWS considers one year of post-construction mortality monitoring insufficient to support or validate expected impacts to migratory birds, bats and other resources presented in Table ES-1.
- 48 13. **Section 3.5.2, Page 3-32:** The first paragraph in this section describes the study area as being approximately 57% grassland and 43% cultivated crops (or 100%). Yet, in the wetlands section, (Section 3.6.2), the document notes that wetlands cover about 1,718 acres, or about 3% of the area, and woodland areas are described as "... small (<100 acres), widely scattered woodlands..." It would be helpful if the acres of trees could likewise be noted, including whether in the uplands or riparian areas.
- 49 14. **Section 3.6.2, Page 3-37, last sentence of 3rd paragraph:** The reader is left with the impression that the wetland boundaries in the croplands and elsewhere "were adjusted" by making them smaller. Note that in 2012, Nebraska suffered a near record drought, the worst since the 1930s. Therefore, the wetlands would not be as large as large as usual, due to the drought. By early June, the cultivated crops would have been planted and the (dry) wetland boundaries likely obscured. It might be useful to recheck a random sample of the wetlands this year to see if the boundaries have truly changed.
- 50 15. **Section 3.7.2.3, Page 3-44, last paragraph of Raptor Nest Survey subsection:** This section will need to be revised to reflect the June, 2014, discovery of an active bald eagle nest within the project boundaries. While the this eagle nest was not located in time to be included in this DEIS, it isn't clear why stick nest surveys conducted in late April or early May could not be included in the DEIS.
- 51 16. **Section 3.7.2.6, Page 3-47, Eagle Stick Nest Survey subsection:** Again, the results of the early April, 2014, eagle stick nest surveys are reported in the DEIS. Why results of follow-up eagle stick nest surveys conducted in late April or early May not included in a DEIS issued in mid-June, 2014.

- 52 17. **Section 3.8.2.1, Page 3-48:** Regarding least tern and piping plover discussion, the document correctly states that there is no suitable breeding habitat for either of these species in the project area. While there is evidence that least terns are not likely to occur in the project area during migration, the migration routes of piping plovers are not well understood, and the species is known to breed in the Niobrara River only five or six miles north of the project area. If there is evidence available to indicate that piping plovers do not migrate over the project area, then it should be presented here. The lack of observation of piping plovers during pre-construction avian surveys at Grand Prairie does not support the conclusion that piping plovers could not occur at the project site during migration; the avian surveys are conducted in June, when piping plovers are already on their breeding areas.
- 53 18. **Section 3.8.2.1, Page 3-49:** Replace the last sentence on this page with: “It’s estimated that only about 4 percent of whooping crane stopovers are documented as confirmed each year (USFWS 2009).”
- 54 19. **Section 3.8.2.1, Page 3-53:** The DEIS should acknowledge that whooping cranes have been observed roosting and foraging in stock ponds, flooded crop fields and in wet meadows on numerous occasions, which do and can occur during migration periods in the Project area. Additionally, whooping cranes will use shallow areas along the shores of lacustrine wetlands and reservoirs, especially when lake levels are low.
- 55 20. **Section 3.8.2.1, Page 3-62, Item number 3):** As noted above, whooping cranes can and do roost in flooded or ponded areas of cultivated grain fields. In a typical year during spring and fall whooping crane migration periods, flooded grain fields provide shallow water for roosting, forage (waste grain and transient insects and amphibia) and good visibility- all characteristics of good stopover habitat. Again, note that the summer of 2012 was one of the driest on record in Nebraska, so the absence of wet playas in this area is not surprising.
- 56 21. **Section 3.8.2.1, Page 3-62, American Burying Beetle (ABB):** The Project area no longer lies outside the known range of the ABB, as stated at the start of the second paragraph in this section. Based on additional ABB surveys conducted through 2013, the range map for ABBs in Nebraska was revised in April, 2014, to extend into western Knox county to the east of the Project area. This section will also need to be modified to include the presence of ABB at two locations within the Project boundaries during follow-up ABB trapping in June 2014.
- 57 22. **Section 3.8.2.1, Page 3-67, Item 1):** The Project area is not located at the western edge of the northern long-eared bat’s (NLEB) range. In Nebraska, the range of NLEB extends west along the Niobrara River and into Montana, and the creeks described as the most likely areas to provide NLEB habitat are wooded tributaries to the Niobrara River which flows into the Missouri River about 17 miles northeast of the Project area.
- 58 23. **Section 3.8.2.1, Page 3-67, Item 2):** That the “...species abundance in central Nebraska is largely unknown...” means that we don’t know how many occur there, not that the

species doesn't occur there. Absence of evidence does not provide evidence of absence. Additionally, approximately 1.7% of the estimated 54,000-acre Project site equals about 920 acres. The riparian tributary streams to the Niobrara River provide corridors of NLEB habitat to an area of known occurrence- the Niobrara River. The last two sentences summarizing the NLEB subsection are completely accurate and unambiguous.

- 59 24. **Section 4.2.1.1, Page 4-89:** Please include a table identifying sources of soil disturbance that sum to 2,709 acres. Because ranges of potential impacts from various Project components are so prevalent and broad (e.g., 45 to 60 miles of new access roads with widths of from 40 to 60 feet) it is the USFWS's understanding that the DEIS analyses uses the higher quantity in the ranges, to be inclusive. However, based on the project descriptions in Section 2.2.1 (access roads, turbines, turbine and construction lay-down areas, electrical substations, O&M building, MET towers, new temporary access roads, etc.), and several assumptions, the USFWS estimated nearly twice the disturbed area: 5,052 acres of temporary disturbance, and 95 acres of permanent disturbance. It would be very useful to have an explanatory table to explain the sources of the permanent and temporary disturbances.
- 60 25. **Section 4.2.1.5, Page 4-90:** Again, the USFWS cautions Geronimo regarding the effect of breaking the grass cover over multiple large areas high on the dunes. Where turbines are most likely to occur, in the Nebraska Sandhills portion of the Grande Prairie Wind Farm. Native grasslands cover a substantial portion of the Project site. The USFWS recommends Geronimo develop a plan of action should initial restoration efforts using typical BMPs fail.
- 61 26. **Section 4.5.1.4, Page 4-96:** Local vegetation resources would be affected on temporary disturbance areas as well as the 235 acres permanently disturbed. Grading or other removal of mixed grass prairie vegetation, whether temporary or permanent, may adversely affect ABB, depending on the depth of grading and time of year. Avoidance and minimization and mitigation measures need to be developed to address potential ABB effects, including use of mechanical and or chemical control methods to control weeds. The seed mixture to be used in grassland restoration should include recommendations for the NGPC botanist to ensure invasive cultivars of various grassland species are avoided.
- 62 27. **Section 4.6.1.4, Page 4-97:** A common location for ABB occurrence is along the bench above wetland boundaries. The FEIS needs to discuss avoidance, minimization and mitigation measures to reduce impacts to this part of wetlands and, potentially, to ABB.
- 63 28. **Section 4.7.1.1, First paragraph, Page 4-98:** In other areas of the DEIS, native grassland is not described as "very limited" within the project area. How many acres of native prairie, whether grazed or not, occurs in the northern and western areas of the Project site, where grassland dominates?

- 64 29. **Section 4.7.1.2, Table 4.7-1, Page 4-102:** While standardized, the amount of bat mortality at these wind energy developments is elusive unless the number of MW produced at the facilities is included.
- 65 30. **Section 4.7.1.2, Page 4-103:** The statement "...The Project area lacks forested corridors and other vertical features and has limited amount of suitable foraging and roosting habitat...." is inaccurate. Remove or modify statement. See comment 25, above.
- 66 31. **Section 4.7.1.2, Last paragraph, Page 4-103:** Discuss the stated bat mortalities within the context of the effects and spread of WNS on bat populations.
- 67 32. **Section 4.7.1.3, Page 4-104:** Please explain how construction of a wind facility with numerous access roads over thousands of acres of grasslands does not fragment grassland habitat for birds. Not all pastures are overgrazed to the point of providing no habitat. Access roads become travel routes for numerous predators that prey on grassland birds, effectively opening large areas to more effective predation.
- 68 33. **Section 4.7.1.3, Page 4-106:** The first full sentence on Page 4-106 is inaccurate. Modify or remove.
- 69 34. **Section 4.7.1.3, Page 4-107:** That night-migrating passerines make up 50 percent of avian mortalities at most wind farm sites points to the importance of proper lighting at wind farm facilities, including temporary and permanent MET towers and down shielding or motion-sensor security lighting at all employee facilities. See comment 2., above.
- 70 35. **Section 4.7.1.3, Page 4-108:** Again, third sentence in second paragraph on this page is inaccurate. Remove or modify.
- 71 36. **Section 4.7.1.3, Page 4-109:** As noted by Michelle Koch during a recent meeting, bird populations suffer extensive mortality from multiple sources. That other sources kill more birds than wind farms is wholly irrelevant. All human-caused take of migratory birds is unlawful, and avoidance and minimization measures to reduce such take need to be included in the project description.
- 72 37. **Section 4.7.1.4, Page 4-111:** This section needs to be modified to include the June, 2014, discovery of an active and productive bald eagle nest within Project boundaries. The EIS should also include the presence of a 2013, active bald eagle nest on Lamb Creek, just east of the Project boundary. What avoidance, minimization and mitigation measures will be implemented to reduce the likelihood of unlawful take of bald eagles?
- 73 38. **Section 4.7.1.5, Page 4-114, 2nd bullet:** Installing marker balls on guy wires of tall MET towers reduces bird collisions during the day, but neither reduces nor prevents mortality of night-migrating songbirds. Modify this bullet to reflect same.

- 74 39. **Section 4.8.1.3, Page 4-115, first paragraph:** Migration routes of piping plovers are not well understood. If Geronimo has evidence to support the conclusion that piping plovers are not expected to migrate through the Project area, when nesting habitat exists 5 to 6 miles to the north, it should be presented here. Otherwise, acknowledge that there is a small probability of piping plovers migrating through the Project site, but that the probability is likely insignificant.
- 75 40. **Section 4.8.1.4, Page 4-117, Item 3:** As noted elsewhere, whooping cranes have been confirmed using stock ponds and flooded, cultivated grain fields during migration. Additionally, 3% of the projects 54,000 acres is 1,620 acres - not an insignificant amount. The last sentence of item 3) is belied by the fact that wetland soils occur in numerous cultivated fields and pastures. If these areas are not inundated during wet periods, wetland soils would not have developed there.
- 76 41. **Section 4.8.1.4, Page 4-118:** When discussing interaction of sandhill cranes with wind turbines, it is appropriate to include a statement that sandhill crane mortality from collision with turbines has been documented in at least two instances.
- 77 42. **Section 4.8.1.4, Page 4-119:** While there may be no documentation of whooping cranes colliding with transmission lines in the upper Great Plains, there have been collisions with distribution and other power lines documented, including in Nebraska. Omission of that fact causes the last sentence of the first paragraph on this page to be misleading.
- 78 43. **Whooping crane section:** As discussed previously, there is a reasonable chance during the next 40 years that whooping cranes could fly through the Grande Prairie wind farm. What makes the likelihood of mortality through collision insignificant, is that a Whooping Crane Contingency Plan is developed and implemented in the unlikely event that whooping cranes may stopover during within 2 to 5 miles away from the Project site. Additionally, the above gen-tie line will be marked with bird flight diverters to reduce the potential for whooping crane collisions with the line. As stated in the sentence immediately preceding the underlined "Mortality Summary", "...Crane monitoring together with curtailment protocols and bird flight diverters are practical and effective measures for minimizing collision risk."
- 79 44. **Section 4.8.1.5, Page 4-119:** This section needs to be rewritten to include the documentation in June, 2014, of ABBs occurring in at least two places within the Project boundaries. Avoidance, minimization and mitigation measures for potential take of this endangered species will need to be included in the Final EIS and Final BA.
- 80 45. **Section 4.8.1.5, Page 4-122:** See comments 25 and 32, above, which also apply to statements on this page.
- 81 46. **Section 4.8.1.9, Pages 123/124:** The avoidance, minimization and mitigation measures listed here will need to conform with the measures for whooping cranes listed in the final BBCS, which will be included in the FEIS. Ditto for the NLEB subsection on pages 124/125.

- 82        47. **Section 4.8.1.10, Page 125:** Modify the summary to reflect presence of ABB at the Project site. See also comment 46, above.
- 83        48. **Section 4.8.1.10, Page 126:** The sentence in the second paragraph includes a phrase that is untrue. Modify the sentence to reflect your intent. (There certainly have been many documented cases of crane mortality, including whooping crane mortality, in the upper Great Plains)!
- 84        49. **Section 4.18, Table 4.18-1, Pages 4-166/167:** ABB and Bald Eagles should be added to this table and to the subsequent individual species sections

The Department has a continuing interest in working with Western to ensure impacts to resources of concern to the Department are adequately addressed. For issues concerning NPS's comments, please contact Regional Environmental Coordinator Nick Chevance, Midwest Regional Office, National Park Service, 601 Riverfront Drive, Omaha, Nebraska 68102, telephone 402-661-1844, email [Nicholas\\_Chevance@nps.gov](mailto:Nicholas_Chevance@nps.gov). If you need further assistance regarding USFWS's comments, please contact Martha Carlisle, at (308) 382-6468 extension 19, email [Martha\\_Carlisle@fws.gov](mailto:Martha_Carlisle@fws.gov).

Sincerely,



Robert F. Stewart  
Regional Environmental Officer

**From:** Terry Julesgard [<mailto:terryj@nntc.net>]  
**Sent:** Monday, August 04, 2014 8:01 AM  
**To:** GrandePrairie  
**Subject:** Comments Draft DOS/EIS 0485 Grande Prairie Wind Farm

Matt Marsh

Please replace my previous emailed comments with these. I found a typo after I emailed the first copy.  
Thanks Terry Julesgard

Comments Draft DOS/EIS 0485 Grande Prairie Wind Farm

85 My wife and I are writing in opposition to the construction of the Grande Prairie Wind Farm proposed for Holt County, Nebraska by Western Area Power Administration. I live approximately six miles north of the proposed site on a small acreage overlooking the Niobrara River Valley. I have several concerns regarding the creation of a large wind farm.

86 The Draft Environmental Impact Statement DOE/EIS-0485 does not adequately address the impact to the local area in regards to climate change caused by large wind farms such as Grande Prairie Wind Farm.

87 This area is predominately production agriculture of irrigated row crop farming and cattle production. Studies show large wind farms cause the temperature to be higher because the turbines continually mix the cooler air at the earth surface with the warmer air which is higher in the atmosphere, thus not allowing the nights to cool down. This will have an adverse affect on row crops by not allowing the plants to open up its leave surface to take in nutrients and breathe disrupting the plants growth. Also higher temperatures will require the producers to irrigate more increasing the cost of production. Alfalfa producers need the evening cool down to attract moisture to the cut hay so they can bail without losing the leaves. As for livestock and wildlife cooler temperatures during the nights give their bodies a chance to recover from the heat of the day and utilize areas of pasture which are too hot during the day. This including people too, we all look forward to the evening when the temperatures begin to cool so we can complete those tasks which were just too hot to do during the day. Liming Zhou, Research Associate Professor at the Department of Atmospheric and Environmental Sciences at the University of New York who has led the study of climate change associated with large wind farms said further research is needed into the effect of the technology on the wider environment. Thus, the potential for regional climate change caused by Grande Prairie Wind Farms needs to be studied completely before this project is allowed to move forward.

88 As stated above I live along the Niobrara River. Less than one half mile from my house is a nesting pair of Bald Eagles with a young fledging along with other Eagles which hunt in the river below the house. Also during the winter months there are thousands of migratory birds which use the open water in the gravel pit to the south of the house and the river as night nesting areas. These birds travel out to the area fields during the day to feed; many of these fields are where the proposed wind turbines are to be located. It is a well know fact wind turbines and bird are not a good combination. Thus, this concern is twofold; I do

not want the birds killed by the turbines, or to cause the birds to winter nest elsewhere because of the wind turbines.

89 The Draft EIS states there will be little impact to the migratory birds but I did not see a detailed study on the impact to the birds which winter in the area of the proposed project. Before Grande Prairie Wind Farm is allowed to continue a detailed study needs to be completed on the effect of the project to the native Eagle population and winter nesting of the migratory bird population.

90 My third objection is purely personal, with that said in politics if one person feels that way there are at least 100 or more who think that way. Wind turbines are eye and noise pollution in its highest form. I have traveled through many areas which have hundreds and even thousands of wind turbines, many of those areas before and after the installation of wind turbines. Even the most desolate areas of Wyoming have lost their beauty because of wind turbines. I travel highway 12 regularly between Butte and Highway 81, instead of seeing the lush rolling hills and fields all one sees by day are ugly white spinning giants or an expanse of red flashing lights by night. My wife and I picked the place where we live now very carefully, we want to see nature and its beauty from my front or rear deck and when we travel to work or for shopping. This project is going to take one of the most beautiful drives in Nebraska and turn it into a waste land of ugly white spinning giants. As for the noise I hope I am far enough away so I do not hear the continues whooshing of the turbines blades. But, because of my work I do travel the area of the proposed project so I will no longer be able to stop and roll down the window to enjoy the sounds and beauty of the area.

For these reasons we stand opposed to the Grande Prairie Wind Farm and respectfully request the project be reconsidered or relocated for lack of a better suggestion to Kansas.

Terry Julesgard  
Tammy Morrow-Julesgard  
89482 US Hwy 281  
Spencer, NE 68777