

Letter Code	Date	Commentor	Comment	Response
<b>Scoping Comments</b>				
1	2/24/2020	Surface Water Quality Program South Dakota Department of Environment and Natural Resources	The South Dakota Department of Environment and Natural Resources (DENR) Surface Water Quality Program has reviewed the proposed Wild Springs Solar Project, in Pennington County, South Dakota. Based on the information provided, DENR has the following comments: 1. At a minimum and regardless of project size, appropriate erosion and sediment control measures must be installed to control the discharge of pollutants from the construction site. Any construction activity that disturbs an area of one or more acres of land must have authorization under the General Permit for Storm Water Discharges Associated with Construction Activities. Contact the Department of Environment and Natural Resources for additional information or guidance at 1-800-SDSTORM (1-800-737-8676) or <a href="http://denr.sd.gov/des/sw/stormwater.aspx">http://denr.sd.gov/des/sw/stormwater.aspx</a> . 2. A Surface Water Discharge permit may be required if any construction dewatering should occur as a result of this project. Please contact this office for more information. 3. Impacts to tributaries, creeks, wetlands, and lakes should be avoided by this project. These waterbodies are considered waters of the state and are protected under Administrative Rules of South Dakota (ARSD) Chapter 74:51. Special construction measures may have to be taken to ensure that water quality standards are not violated. 4. The discharge of pollutants from any source, including indiscriminate use of fill material, may not cause destruction or impairment except where authorized under Section 404 of the Federal Water Pollution Control Act. Please contact the United States Army Corps of Engineers for more information 605-224-8531.	Comment acknowledged. The Project acknowledges that stormwater drainage basins may be needed as stormwater runoff mitigation according to the Pennington County Stormwater Quality Manual. See EA Section 3.5 for more information.
2	3/4/2020	USDA-NRCS Huron State Office	Thank you for the opportunity to provide Farmland Protection Policy Act (FPPA) review of this project.  The project does impact land of statewide importance. Enclosed is a Web Soil Survey map delineating the FPPA farmland classifications of the proposed site. Also enclosed is a Farmland Conversion Impact Rating Form (AD-1006) for this project. We have completed Parts II, IV, and V. Please complete parts I, III, VI, and VII as per instructions on the back of the form and the attached document titled Site Assessment Scoring for the Twelve Factors Used in FPPA. If the TOTAL POINTS in part VII is less than 160 points, the proposed activity will have no significant impact on the prime farmland or farmland of statewide importance in Pennington County, and no further alternatives need be considered.  The Natural Resources Conservation Service (NRCS) would advise the applicant to consult with the local NRCS and Farm Service Agency offices regarding any United States Department of Agriculture easements or contracts in the project areas that may be affected. For any other easements outside of the NRCS, you should check with the local courthouse.	The Project evaluated twelve factors defined by USDA and scored 76 out of 160. This information has been provided to USDA to complete their evaluation of the FPPA.
3-1	4/3/20	South Dakota Game, Fish and Parks	Email introduction introducing SDGFPS April 3, 2020 comment letter and providing context to the agency's July 7, 2017 and October 22, 2019 comment letters, which were also included.	N/A
3-2	4/3/20	South Dakota Game, Fish and Parks	Thank you for contacting the South Dakota Department of Game, Fish and Parks (SDGFP) regarding the above-mentioned project involving the construction of a 128 megawatt solar energy system, substation, underground transmission line, access roads and a maintenance and operation center in Pennington County, South Dakota. We have prepared the following comments and suggestions to be considered as part of the environmental assessment (EA) to be prepared by Western Area Power Administration.  Siting and operation of solar projects has the potential to directly and indirectly impact area wildlife. This may occur by altering habitats, influencing behavior patterns and directly killing individuals through collisions with project infrastructure. In particular, SDGFP is concerned about habitat alteration as a result of this proposed project, and effects on grassland dependent species. SDGFP has provided two letters (dated 7/7/17 and 10/22/19) to the project developer (Geronimo Energy LLC; hereafter the developer) stating our concerns regarding habitat alterations. We ask that these two letters from SDGFP are incorporated by reference.  In a January 22nd, 2020 meeting with the project developer, representatives of SDGFP and the US Fish and Wildlife Service South Dakota Ecological Services Office discussed the project and potential impacts to wildlife. During this meeting, SDGFP made the developer aware of concerns regarding alteration of grassland habitat, potential sensitive species that could occur in the project area, exclusion of big game from the project area and urged the developer to exclude prairie dog colonies from the project. We have included additional information related to these concerns below.	Comments acknowledged. The two letters (dated 7/7/17 and 10/22/19) have been incorporated into the project record.
3-3	4/3/20	South Dakota Game, Fish and Parks	The developer is proposing to conduct one year of pre-construction breeding bird surveys at the project site. In our letter dated October 22 2019, SDGFP recommended completing two years of pre-construction surveys. Pre-construction survey data usually incorporates a small snap-shot in time but is used to assess risks for the life of a project (~30 years) therefore, it is important to perform surveys with a high degree of scientific rigor, and to capture temporal variation in wildlife use of the project area. SDGFP would prefer if a minimum of two years of pre-construction breeding bird surveys were completed within the project area.	Wild Springs has conducted two years of pre-construction surveys for prairie grouse and raptors. Wild Springs has conducted one year of grassland breeding bird surveys. All of these studies have a scientifically rigorous methodology.
3-4	4/3/20	South Dakota Game, Fish and Parks	If major impacts are predicted from these surveys, development in the area should be avoided. If less serious impacts are anticipated, mitigation is recommended to reduce these impacts. The developer proposed that post-construction wildlife use studies may be completed in-lieu of post-construction mortality monitoring. SDGFP believes that some level of post-construction mortality monitoring would still be useful to determine impacts to wildlife. We recommend that post-construction wildlife use studies be designed and conducted to assess impacts of the project, compare to predictions from pre-construction surveys, and to evaluate potential mitigation measures. We also recommend that post-construction surveys use methods that are directly comparable to pre-construction survey methods. Little research exists on the impacts of solar energy facilities sited in grassland and herbaceous habitat, and post-construction wildlife use studies would be valuable to assist with future project review and planning. Information on efforts to survey for and document sensitive species and habitats, as well as how risk will be avoided or mitigated should be included in the EA.	Depending on the outcome of the South Dakota Public Utilities Commission Process, Wild Springs will conduct one of the following studies: pre-construction and two years of post-construction breeding bird surveys to determine if any displacement or change in avian use has occurred, or, two year post-construction facility monitoring study to assess direct impacts of the Project. Information regarding survey efforts and environmental commitments can be found in Chapter 3 (Fish and Wildlife).
3-5	4/3/20	South Dakota Game, Fish and Parks	A desktop review of the project indicated that most of the proposed area is classified as grassland/herbaceous cover in the 2011 National Land Cover Database ( <a href="https://www.mrlc.gov/">https://www.mrlc.gov/</a> ). Remnant prairie tracts have high conservation value, especially those that contain a high diversity of both plant and animal species, and rare or non-existent invasive species. The project area could contain untilled native grasslands. Impacts to these habitats may be unavoidable, but SDGFP would still recommend the project area be surveyed for untilled tracts of native prairie and recommend efforts be taken not to place solar panels, roads, collection lines and facilities in these areas. The EA should provide information on the extent of grassland in the area, ways to avoid direct loss of grassland acres and ways to reduce degradation and fragmentation.	Potential undisturbed lands data (Bauman et al., 2013) exists for the Prairie Coteau/Prairie Pothole Region east of the Missouri River in South Dakota; the analysis has not been completed for the more arid rangeland west of the Missouri River, including Pennington County. For the purposes of the analysis in the EA, Wild Springs assumed land classified as herbaceous may be undisturbed. Based on several field visits, Wild Springs notes that non-cropped areas are actively hayed or heavily grazed, indicating some level of disturbance. Vegetation impacts and environmental commitments can be found in Chapter 3 (Land Use and Land Cover).
3-6	4/3/20	South Dakota Game, Fish and Parks	We have conducted a search of the SD Natural Heritage Database (NHD) within the project boundary. This database monitors species at risk, specifically those species that are legally designated as threatened or endangered or rare. Rare species are those that are declining and restricted to limited habitat or a jurisdiction, may be isolated or disjunct due to geographic or climatic factors that are classified as such due to lack of survey data. A list of monitored species can be found at <a href="http://gfp.sd.gov/natural-heritage-program">http://gfp.sd.gov/natural-heritage-program</a> .  No records of threatened, endangered or rare species were found in the project area. Many places in South Dakota have not been surveyed for rare or protected species and the absence of a species from the database does not preclude its presence from the project area. If surveys indicate that state endangered, threatened or rare species may occur in the project area, South Dakota Codified Law 34A-8-8 allows for only limited and specific authorized take of threatened and endangered species for scientific, zoological or educational purposes. For more information, please visit <a href="https://gfp.sd.gov/licenses/other-permits/endangered-species-permit.aspx">https://gfp.sd.gov/licenses/other-permits/endangered-species-permit.aspx</a> .	Commented noted.

3-7	4/3/20	South Dakota Game, Fish and Parks	<p>In North America, grassland birds have experienced consistent and long-term declines (Peterjohn and Sauer 1999, Rosenberg et al. 2019). The USFWS publishes a list of bird species of habitat fragmentation concern (Bakker 2020). These species are those which research and literature indicate are negatively affected by loss and fragmentation of habitat. Fragmentation includes cutting habitats into smaller, more isolated blocks and the creation of barriers (such as the inclusion of trees in prairies, barren land in forested areas, wind turbines, roads, etc.). The effects of fragmentation on species of concern include avoidance of fragmented areas or decreased density, survival, and/or reproduction in fragmented habitats. Species of habitat fragmentation concern that may inhabit the project area include:</p> <p>Burrowing owl (<i>Athene cucularia</i>) Upland Sandpiper (<i>Bartramia longicauda</i>) Longbilled Curlew (<i>Numenius americanus</i>) Western Meadow Lark (<i>Sturnella neglecta</i>) Lark Bunting (<i>Calamospiza melanocorys</i>) Sharp-tailed grouse (<i>Tympanuchus phasianellus</i>) Grasshopper Sparrow (<i>Ammodramus savannarum</i>) Northern Harrier (<i>Circus cyaneus</i>) Sprague's Pipit (<i>Anthus spragueii</i>) Chesnut-collared Longspur (<i>Calcarius ornatus</i>) Savannah Sparrow (<i>Passerculus sandwichensis</i>)</p>	Comment noted. South Dakota Grassland Birds of Fragmentation Concern are described in Chapter 3 (Fish and Wildlife).
3-8	4/3/20	South Dakota Game, Fish and Parks	<p>Additionally, a search of the NHD indicated that there are nesting burrowing owl (<i>Athene cucularia</i>) located west of the project. Although no records of burrowing owl were found in the immediate project area, the presence of prairie dog towns within and adjacent to the project boundary could provide suitable habitat for this species. In addition to being a species of habitat fragmentation concern, the burrowing owl is listed as a species of greatest conservation need in South Dakota. Burrowing owls nest in grasslands with few trees, and inhabit prairie dog towns larger than 25 acres (Griebel and Savidge 2007, Thiele et al. 2013). The breeding season in South Dakota is mid-May to early August. SDGFP suggests avoiding construction within 0.25 miles of an active burrowing owl nest, if any are identified during breeding bird surveys. These recommendations for burrowing owl nest avoidance measures should be included in the EA.</p>	Comment noted.
3-9	4/3/20	South Dakota Game, Fish and Parks	<p>There is a Natural Heritage Database record of burrowing owl west of the Project. This species is a species of greatest conservation need and utilizes prairie dog colonies for breeding and there is a colony in the Project Area. SDGFP requests avoiding construction within 0.25 mile of an active burrowing owl nest.</p>	The Project has committed to avoiding construction within 0.25 miles of an active burrowing owl nest during the nesting season (May 15 to August 15).
3-10	4/3/20	South Dakota Game, Fish and Parks	<p>SDGFP generally recommends two years of prairie grouse lek surveys in a project area prior to development. Prairie grouse (sharp-tailed grouse and greater prairie chicken (<i>T. cupido</i>)) inhabit large in-tact blocks of native grassland. Development (roads, power lines, solar panels, buildings, etc.) in and around prairie grouse habitat can fragment otherwise suitable habitat and displace birds. Prairie grouse are indicators of high quality grassland habitat and a robust ecological community due to their specific habitat needs. The developers of the project completed an initial prairie grouse lek survey in 2017 and plan to conduct an additional year of surveys in 2020. If prairie grouse leks are found during the 2020 surveys, we suggest a two mile no construction buffer during the lekking and subsequent nesting season (1 March to 30 June). Sharp-tail grouse are sensitive to noise, and construction near leks could cause birds to abandon leks. If the developer determines it is not feasible to cease construction within the two mile buffer during the lekking season, SDGFP asks that construction activities are limited to the period 3 hours after sunrise to 1 hour before sunset. These recommendations for sharp-tailed grouse lek avoidance measures should be included in the EA.</p>	Wild Springs has conducted two years of pre-construction prairie grouse surveys. There were no leks were documented in the current Project Boundary during the 2020 surveys. Six prairie grouse were recorded during surveys, but there was no observed lekking behavior and a lack of concentrated sign.
3-11	4/3/20	South Dakota Game, Fish and Parks	<p>The developer proposes to use underground transmission lines, which will reduce impacts to avian species. We include the following information for the reviewers and developers to consider if any above-ground power lines will be a part of the project. Avian use of energized poles includes perching (for hunting and roosting), nesting, and resting (including shelter during inclement weather). Large birds (e.g. eagles, hawks) that use energized poles can be electrocuted if energized equipment is not insulated properly to minimize risks. Other avian species could potentially collide with the lines, including waterfowl, and sharp-tailed grouse, which do not generally perch on tall transmission lines. If any above-ground transmission lines are built in addition to the proposed underground transmission line, SDGFP recommends all new construction should follow or exceed Avian Power Line Interaction Committee (APLIC) construction design standards for avian-safe passage and use. See <a href="https://www.aplic.org/">https://www.aplic.org/</a> for specific guidance on how to mitigate collision and electrocution risks to avian species. Ways to reduce or mitigate the impacts of power line strikes and electrocutions should be provided in the EA, including the suggestions from APLIC.</p>	Wild Springs Solar's gen-tie transmission line would be constructed according to Avian Power Line Interaction Committee's recommendations on conductor spacing, line grounding, and transmissin line configuration on the poles to minimize the risk of electrocution to birds.
3-12	4/3/20	South Dakota Game, Fish and Parks	<p>Swift fox (<i>Vulpes velox</i>) are listed as state threatened by SDGFP. Swift fox typically inhabit short grass to midgrass prairies with gently rolling topography. Swift fox will enlarge burrows of other burrowing animals (e.g. black tailed prairie dogs) or create their own dens in loose soils (Higgins et al. 2000). Habitat loss is the greatest threat to swift fox populations throughout its range. No records of swift fox occur within the project area, however swift fox can be difficult to detect. If a swift fox den is discovered during construction of the project, SDGFP recommends avoiding construction in the immediate area (0.25 mile buffer), if feasible.</p> <p>During the January 2020 meeting, the developer indicated that prairie dog towns were identified in the project area. We recommend not siting project components within prairie dog colonies (if feasible) to reduce disturbance to swift fox and burrowing owl habitat, as well as to reduce the risk of collision for avian predators that may forage in prairie dog colonies. Collisions with vehicles associated with construction, operation, and maintenance activities are also a concern if swift fox are found in the project area. We recommend reducing speed limits within the project during construction, operation and maintenance activities. SDGFP requests that recommendations for avoiding risks to swift fox are included in the EA.</p>	No suitable swift fox dens were identified in the 2019 mapped prairie dog colony. However, if newly formed larger burrows (that could be used by larger mammals- e.g., badger or Swift fox within the fenceline are identified prior to construction, they would be left intact but monitored for activity during the natal denning season (April 15 to July 1) and collapsed if not active. Alternatively, if construction does not commence until the Spring of 2022, any existing larger burrows that could be used by a badger or Swift fox would be collapsed outside of the denning season in the early winter of 2021.
3-13	4/3/20	South Dakota Game, Fish and Parks	<p>The project area is also home to populations of mule deer (<i>Odocoileus hemionus</i>), whitetail deer (<i>O.virginianus</i>) and antelope (<i>Antilocapra americana</i>). We do not anticipate this project to pose a significant impact to these species. However, the developer indicated that a security fence will be installed around the project boundary. We suggest a woven wire/chain link fence be at least 7-8' tall to exclude deer and antelope. We also request that biologists and/or construction crews assure big game animals (particularly fawns, depending on construction timing) are void of the facility before fencing is permanently closed. The wire should be installed tight to the ground, or possibly buried. For more information on building wildlife-friendly fencing please see: <a href="https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_026389.pdf">https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_026389.pdf</a>. SDGFP requests that recommendations for avoiding impacts to deer and antelope are included in the EA.</p>	Permanent fencing is designed to enclose eight blocks of panels, not surround the entire Project Footprint with a single fence. Additionally, the collector substation would have its own perimeter fencing. In both cases, the fencing would consist of a chain link fence and would extend approximately 6 feet above grade with one foot of barbed wire to comply with the National Electric Code , and to provide security and safety. Additional prairie dog exclusionary fencing options may be utilized in portions of the Project such as chicken-wire below the chain link fence extending below grade. The perimeter of the Project Footprint would be fenced to prevent big game species from entering and it would be ensured that no big game species are within the fence during construction.

4-1	3/9/20	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>This letter is in response to your request dated February 11, 2020, for environmental comments regarding the proposed Wild Springs Solar Project, a photovoltaic ground-mounted solar energy system and associated facilities, potentially generating up to 128-megawatt (MW). The project is proposed on private lands south of New Underwood in Pennington County, South Dakota.</p> <p>We previously provided a letter to the developer of this project; Geronimo Energy, dated July 3, 2017, that had been copied to your office; a second copy is enclosed for your convenience. That letter provides information regarding the species and resources of concern that may occur in the project area (federally listed species, eagles, migratory birds, Birds of Conservation Concern, wetlands) as well as some recommendations to reduce impacts to those resources. The comments in that July 3, 2017, letter still apply to this project, with exception of language regarding incidental take of migratory birds per the December 17, 2017, U.S. Department of Interior, Solicitor's Opinion, M-37050 (online: <a href="https://www.doi.gov/solicitor/opinions/">https://www.doi.gov/solicitor/opinions/</a>). Note, that M-37050 addresses incidental take of migratory birds under the Migratory Bird Treaty Act (16 U.S.C. 703-712; MBTA), but incidental take does not include habitat impacts such as removal of habitat nor displacement of wildlife from habitat.</p> <p>We also recently provided you with a report titled South Dakota Species of Habitat Fragmentation Concern: Grassland Birds. Species listed in that document are likely to be affected by activities on the landscape that reduce the size of contiguous grasslands into smaller and more isolated patches. Some of these species are likely to occur at the Wild Springs Solar project area and placement of solar panels effectively blanketing grassland habitat will likely be to the detriment of these sensitive species. Many are also currently recognized as species of concern by our agency and the State of South Dakota.</p> <p>Activities that alter or destroy grassland bird nesting habitat may fall under the Service's 1981 mitigation policy, available online at: <a href="https://www.fws.gov/policy/a1npi8902.pdf">https://www.fws.gov/policy/a1npi8902.pdf</a>. This policy assures consistent and effective mitigation recommendations that facilitate mitigation by Federal action agencies and developers early in the action process, thereby avoiding delays and assuring equal consideration of fish and wildlife resources with other project features and purposes. Our policy adopts the definition of the term "mitigation" as stated in the NEPA regulations which includes: "(a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the impact by restoring the affected environment; (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and (e) compensating for the impact by replacing or providing substitute resources or environments."</p>	Comments noted.
4-2	3/9/20	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>During a January 22, 2020, meeting with Geronimo representative Melissa Schmit regarding this project, we reiterated a primary recommendation in our July 3, 2017, letter: to avoid intact grassland areas as much as possible. Grasslands compose the dominant habitat type (75.5% per reports provided to us by Geronimo) within the Wild Springs Solar Project area; ideally project boundaries would be shifted or a new location would be chosen to reduce this impact. We continue to recommend measures to reduce the footprint of this project on grassland habitats.</p>	Construction of the solar facilities would not require removal of all vegetation within the Project Footprint. Rather, ground disturbance and vegetation clearing would be limited to some areas with greater than 5 percent slope and permanent facilities such as access roads, Project substation, O&M building, parking lot, and inverters. These facilities would permanently convert herbaceous vegetation land (38.9 acres) to impervious surfaces for the life of the Project. While nearly 74% of the Project Footprint is herbaceous, Wild Springs has limited ground disturbance and vegetation removal to the permanent facilities listed above and some areas that may require grading. Most of the herbaceous land will not be disturbed.
4-3	3/9/20	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>Also during that meeting, we reiterated another recommendation: to offset the impacts to migratory birds, particularly grassland nesting species, expected to result from this development. Some information is available from other solar farms regarding environmental impacts, but few project are established in South Dakota at this time. The Wild Springs project, should it proceed, provides an opportunity in South Dakota to gather data that could inform the level of offsets needed to address anticipated change in avian diversity, density, and/or species composition. Incidental take of migratory birds would also be valuable information to understand that aspect of solar project effects in South Dakota, but the primary focus would be the impact of this site to birds via habitat impacts. Geronimo has provided some information indicating post-construction surveys will be completed; we recommend the resulting information be used to develop a habitat offset plan for the benefit of grassland birds.</p> <p>Our emphasis on grassland birds and habitat offsets is reinforced by the recent finding that the majority of North American bird species are in decline, exhibiting a 29% reduction in abundance or a loss of 2.9 billion birds across almost all biomes since 1970 (Rosenberg et al. 2019). Among those, grassland nesting birds have experienced the greatest population losses: approximately 53% declines in populations across North America, equating to more than 700 million breeding individuals encompassing 31 species (Rosenberg et al. 2019). Conserving native prairie for the benefit of grassland nesting birds is an environmental priority in South Dakota.</p>	As mentioned in the comment, Wild Springs has designed pre- and post-construction studies to understand potential impacts to grassland birds and their habitat. If the South Dakota PUC orders the breeding bird post-construction study (instead of the fatality monitorint), the study will be the first of its kind in a grassland setting in the Upper Great Plains. At this time, there are no studies in the Upper Great Plains that demonstrate changes in avian diversity, density, and/or species composition to grassland birds from solar facilities. As such, Wild Springs will not be developing a habitat offset plan.
4-4	3/9/20	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>If changes are made in the project plans or operating criteria, or if additional information becomes available, the Service should be informed so that the above determinations can be reconsidered.</p>	Comment noted.
4-5	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>This letter is in response to your request received June 5, 2017, for environmental comments regarding the above referenced Wild Springs Solar project near New Underwood, Pennington County, South Dakota. The project proposal includes solar facilities, fencing, roads, a substation, collection lines and weather station(s) as well as a 115 kV (presumably overhead) transmission line to connect to the existing New Underwood Substation (route yet to be determined). The federal nexus for this project is an interconnection with Western Area Power Administration's (Western) transmission system, thus we have provided a copy of this correspondence to Western's Billings, Montana, office.</p> <p>In accordance with section 7(c) of the Endangered Species Act, as amended, 16 U.S.C. 1531 et seq., we have determined that the following federally listed species may occur in the project area (this list is considered valid for 90 days):</p> <p>Whooping Crane (<i>Grus americana</i>); Endangered; Migration Northern Long-eared Bat (<i>Myotis septentrionalis</i>); Threatened; Summer resident, seasonal migrant, Black Hills winter resident</p>	Comment noted
4-6	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>Whooping cranes migrate through South Dakota on their way to northern breeding grounds and southern wintering areas. They occupy numerous habitats such as cropland and pastures; wet meadows; shallow marshes; shallow portions of rivers, lakes, reservoirs, and stock ponds; and both freshwater and alkaline basins for feeding and loafing. Overnight roosting sites frequently require shallow water in which to stand and rest. Should construction occur during spring or fall migration, the potential for disturbances to whooping cranes exists. Disturbance (flushing the birds) stresses them at critical times of the year. We recommend remaining vigilant for these birds. There is little that can be done to reduce disturbance besides ceasing construction at sites where the birds have been observed. The birds normally do not stay in any one area for long during migration. Any whooping crane sightings should be reported to this office.</p>	The Project's location, on the edge of the 95 percent national migration corridor, greatly reduces the likelihood of whooping crane stopovers and associated potential impacts. Any whooping crane sightings will be reported to USFWS.
4-7	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>The northern long-eared bat is a medium-sized brown bat listed as threatened under the Endangered Species Act. Northern long-eared bats are known to be present in South Dakota during the summer months, primarily roosting singly or in colonies underneath bark, in cavities or in crevices of both live and dead trees. Hibernacula have been documented in caves/mines in the Black Hills, and the species has been documented in other areas in the state during the summer months. White nose syndrome - a fungus affecting hibernating bats - is considered a significant threat to this species, but individuals may be harmed by other activities such as modifications to hibernacula, timber harvest, human disturbance, and collisions with wind turbines. A 4(d) rule has been published that exempts take of Northern long-eared bats in certain circumstances. For more information, see: <a href="https://www.fws.gov/Midwest/Endangered/mammals/nleb/index.html">https://www.fws.gov/Midwest/Endangered/mammals/nleb/index.html</a>.</p>	There is no Project activity within 0.25 mile from known hibernacula, no clearing of maternity roost trees, and no tree clearing within 150 feet from known maternity roost trees during June and July. Up to five isolated trees would be cleared as a result of Project construction, but these trees are not considered suitable bat habitat due to their isolated nature and distance from suitable habitat that comprise connectivity buffers. Regardless, Wild Springs would not remove trees between June 1 and July 31.
4-8	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>If Western or their designated representative determines that the project "may adversely affect" listed species in South Dakota, it should request formal consultation from this office. If a "may affect - not likely to adversely affect" determination is made for this project, it should be submitted to this office for concurrence. If a "no effect" determination is made, further consultation may not be necessary. However, a copy of the determination should be sent to this office.</p>	Comment noted. WAPA anticipates determinations of "no effect" and will notify your office.

4-9	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	According to National Wetlands Inventory maps, (available online at <a href="https://www.fws.gov/wetlands/">https://www.fws.gov/wetlands/</a> ) wetlands exist at the proposed construction area. If a project may impact wetlands or other important fish and wildlife habitats, the U.S. Fish and Wildlife Service (Service), in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347) and other environmental laws and rules, recommends complete avoidance of these areas, if possible, then minimization of any adverse impacts, and finally replacement of any lost acres, in that order. Alternatives should be examined and the least damaging practical alternative selected. If wetland impacts are unavoidable, a mitigation plan addressing the number and types of wetland acres to be impacted, and the methods of replacement should be prepared and submitted to the resource agencies for review.	The Project design avoids impacts to all but one delineated wetland. There is one wetland/waterbody complex where collection lines would either be bored beneath the wetland/waterbody or a Nationwide Permit for dredge and fill within waters of the U.S. under Section 404 of the CWA will be utilized.
4-10	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	Land use of the project area was not provided in your letter, but satellite imagery suggests hayland, pasture, and cropland exist within the project boundaries. Of concern within intact grasslands on the site are migratory birds and nesting habitat. In accordance with Executive Order 13186 regarding migratory bird protection, we recommend avoidance, minimization, and finally replacement of habitat to reduce the impacts to species protected by the Migratory Bird Treaty Act (MBTA). Impacts resulting from this project could include displacement, avoidance, and/or mortality of birds that reside in the area or migrate through it. We recommend evaluation of the proposed project area for migratory bird use prior to construction, followed by postconstruction monitoring and evaluation of impacts. Results should be reported to this office. A mitigation plan that specifically addresses direct and indirect take of birds during and after construction is also recommended, particularly if project impacts must occur within intact native grasslands. Such a plan could include prairie restoration, establishment of easements, or purchase of fee title lands. We can provide further guidance in this regard if the proposed project progresses.	Wild Springs has evaluated the project area for migratory bird use and will implement post-construction monitoring for impacts to migratory birds. The Project intends to reseed disturbed vegetation but does not intend to prepare a specific mitigation plan for migratory birds, purchase fee title land, or establish grassland easements.
4-11	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	Our Birds of Conservation Concern 2008 document identifies grassland nesting birds that may occur at your proposed project site. This document (available at the following website: <a href="http://www.fws.gov/migratorybird/pdf/grants/Birdsofconservationconcern2008.pdf">http://www.fws.gov/migratorybird/pdf/grants/Birdsofconservationconcern2008.pdf</a> ) is intended to identify species in need of coordinated and proactive conservation efforts among State, Federal, and private entities, with the goals of precluding future evaluation of these species for Endangered Species Act protections and promoting/conserving long-term avian diversity. Primary threats impacting grassland species that occur in South Dakota are habitat loss and fragmentation; these impacts are anticipated as a result of this proposed project.	Comment noted.
4-12	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	The Migratory Bird Treaty Act prohibits the taking, killing, possession, and transportation, (among other actions) of migratory birds, their eggs, parts, and nests, except when specifically permitted by regulations. While the MBTA has no provision for allowing unauthorized take, the Service realizes that some birds may be killed as a result of the proposed project even if all known reasonable and effective measures to protect birds are used. The Service's Office of Law Enforcement carries out its mission to protect migratory birds through investigations and enforcement, as well as by fostering relationships with individuals, companies, and industries that have taken effective steps to avoid take of migratory birds and by encouraging others to implement measures to avoid take of migratory birds. It is not possible to absolve individuals, companies, or agencies from liability even if they implement bird mortality avoidance or other similar protective measures. However, the Office of Law Enforcement focuses its resources on investigating and prosecuting individuals and companies that take migratory birds without identifying and implementing all reasonable, prudent and effective measures to avoid that take. Companies are encouraged to work closely with Service biologists to identify available protective measures when developing project plans and/or avian protection plans, and to implement those measures prior to/during construction, operation, or similar activities.	Comment noted.
4-13	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	Eagles are also protected by the MBTA as well as the Bald and Golden Eagle Protection Act (BGEPA). Golden eagles ( <i>Aquila chrysaetos</i> ) are year-round residents in western South Dakota, and may be found throughout the state in winter or during migration, while Bald eagles ( <i>Haliaeetus leucocephalus</i> ) occur throughout South Dakota in all seasons. The MBTA and BGEPA protect eagles from a variety of harmful actions and impacts. The Service has guidance regarding means to protect eagles: <ul style="list-style-type: none"> <li>• Our 2007 National Bald Eagle Management Guidelines are available online: <a href="https://www.fws.gov/southdakotafieldoffice/NationalBaldEagleManagementGuidelines.pdf">https://www.fws.gov/southdakotafieldoffice/NationalBaldEagleManagementGuidelines.pdf</a>. We recommend reviewing these guidelines as they advise of circumstances where these laws may apply and assist you in avoiding potential violations.</li> <li>• Our 2009 final rule (50 C.F.R. §§ 22.26 and 22.27) authorizing issuance of permits to take bald and golden eagles, where the take is compatible with the preservation of the bald eagle and the golden eagle, is associated with and not the purpose of an otherwise lawful activity, has been avoided to the maximum degree practicable, and the remaining take is unavoidable. We recently amended the eagle permit regulations; see: <a href="https://www.gpo.gov/fdsys/pkg/FR-2016-12-16/pdf/2016-29908.pdf">https://www.gpo.gov/fdsys/pkg/FR-2016-12-16/pdf/2016-29908.pdf</a>.</li> </ul>	Comment noted; there are no eagle nests located within one mile of the Project Area.
4-14	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	Your project includes construction of an overhead powerline, which are known to kill birds via electrocution and line strikes. Thousands of birds, including endangered species, are killed annually as they attempt to utilize overhead power lines as nesting, hunting, resting, feeding, and sunning sites. The Service recommends the installation of underground, rather than overhead, power lines whenever possible/appropriate to minimize environmental disturbances. For all new overhead lines or modernization of old overhead lines, we recommend incorporating measures to prevent avian electrocutions. The publication entitled Suggested Practices for Avian Protection on Power Lines - The State of the Art in 2006 has many good suggestions including pole extensions, modified positioning of live phase conductors and ground wires, placement of perch guards and elevated perches, elimination of cross arms, use of wood (not metal) braces, and installation of various insulating covers. You may obtain this publication by contacting the Edison Electric Institute via their website at: <a href="http://www.eei.org/resourcesandmedia/products/Pages/products.aspx">http://www.eei.org/resourcesandmedia/products/Pages/products.aspx</a> , or by calling 202-508-5000.  Please note that utilizing just one of the "Suggested Practices ..." methods may not entirely remove the threat of electrocution to raptors. In fact, improper use of some methods may increase electrocution mortality. Perch guards, for example, may be only partially effective as some birds may still attempt to perch on structures with misplaced or small-sized guards and suffer electrocution as they approach too close to conducting materials. Among the most dangerous structures to raptors are poles that are located at a crossing of two or more lines, exposed above-ground transformers, or dead end poles. Numerous hot and neutral lines at these sites, combined with inadequate spacing between conductors, increase the threat of raptor electrocutions. Perch guards placed on other poles has, in some cases, served to actually shift birds to these more dangerous sites, increasing the number of mortalities. Thus, it may be necessary to utilize other methods or combine methods to achieve the best results. The same principles may be applied to substation structures.  Please also note that the spacing recommendation within the "Suggested Practices ..." publication of at least 60 inches between conductors or features that cause grounding may not be protective of larger raptors such as eagles. This measure was based on the fact that the skin-to-skin contact distance on these birds (i.e., talon to beak, wrist to wrist, etc.) is less than 60 inches. However, an adult eagle's wingspan (distance between feather tips) may vary from 66 to 96 inches depending on the species (golden or bald) and gender of the bird, and unfortunately, wet feathers in contact with conductors and/or grounding connections can result in a lethal electrical surge. Thus, the focus of the above precautionary measures should be to a) provide more than 96 inches of spacing between conductors or grounding features, b) insulate exposed conducting features so that contact will not cause raptor electrocution, and/or c) prevent raptors from perching on the poles in the first place.	Wild Springs Solar's gen-tie transmission line would be constructed to minimize the risk of electrocution to birds by spacing conductors at least 60" from other equipment.

4-15	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	<p>Additional information regarding simple, effective ways to prevent raptor electrocutions on power lines is available in video form. Raptors at Risk may be obtained by contacting EDM International, Inc. at 4001 Automation Way, Fort Collins, Colorado 80525-3479, Telephone No. (970) 204-4001, or by visiting their website at: <a href="https://www.edmlink.com/component/zoo/item/video-raptors-at-risk?Lemid=240">https://www.edmlink.com/component/zoo/item/video-raptors-at-risk?Lemid=240</a>.</p> <p>In addition to electrocution, overhead power lines also present the threat of avian line strike mortality. Particularly in situations where these lines are adjacent to wetlands or where waters exist on opposite sides of the lines, we recommend marking them in order to make them more visible to birds. For more information on bird strikes, please see Reducing Avian Collisions with Power Lines: The State of the Art in 2012 which, again, may be obtained by contacting the Edison Electric Institute via their website at <a href="https://www.eei.org/resourcesandmedia/products/Pages/products.asp">https://www.eei.org/resourcesandmedia/products/Pages/products.asp</a>, or by calling 202-508- 5000.</p> <p>Please note that, while marking of power lines reduces line strike mortality, it does not preclude it entirely. Thus, marking of additional, existing, overhead lines is recommended to further offset the potential for avian line strike mortality.</p>	Comment noted.
4-16	7/3/17	U.S. Fish and Wildlife Service, South Dakota Ecological Services	If changes are made in the project plans or operating criteria, or if additional information becomes available, the Service should be informed so that the above determinations can be reconsidered.	Comment noted.
5-1	4/2/17	Izaak Walton League of America	<p>The South Dakota Division of the Izaak Walton League of America (IWLA and Division) appreciates this opportunity to provide scoping comments on the proposed Wild Springs Solar Project. This project would include construction of a 128 megawatt solar energy system that would be built on 1400 acres of private land near New Underwood.</p> <p>The IWLA is supportive of solar energy development. Our national energy policy calls for taking full advantage of energy-saving technologies and renewable forms of energy such as solar, wind, and geothermal. The League opposes any future action that would negatively impact the adoption of solar power on a wider basis. League policy also encourages individuals and every level of government to switch from fossil fuels to clean solar and wind energy. League policy encourages and advocates for development and improvement of energy storage options to make clean solar and wind energy useful at all times, day and night, and in all weather conditions.</p> <p>The output of the proposed Wild Springs Solar Project would go to the Basin Electric Power Cooperative that serves three million consumers in nine states. The project would be connected to the Western Area Power Administration's New Underwood substation.</p> <p>The Division anticipates the release of the Environmental Assessment (EA) conducted under the National Environmental Policy Act for this project.</p> <p>In this process the Division respectfully requests that the EA give full consideration of all possible environmental impacts of this project and the associated infrastructure including these topics:</p>	Comment noted.
5-2	4/2/17	Izaak Walton League of America	There will be service roads throughout the 1400 acre interior of the project and around the perimeter. While the Division understands roads are needed for this project, we ask that the EA examine the impact of the planned roads and if they fragment grassland and prairie habitat.	Impacts of fragmentation is described in Chapter 3 (Land Use and Land Cover and Fish and Wildlife).
5-3	4/2/17	Izaak Walton League of America	The entire 1,400 acres will be enclosed with a six foot chain link fence. The stated purpose of the fence is to protect the project from livestock, deer and antelope. We request the EA consider the effects of the fence on local predator-prey relationships, possible interference with wildlife migration and if big game animals would be able to get out of the enclosure if they enter the area by way of large snow drifts.	<p>fencing is designed to enclose eight blocks of panels, not surround the entire Project Footprint with a single fence. Additionally, the collector substation would have its own perimeter fencing. In both cases, the fencing would consist of a chain link fence and would extend approximately 6 feet above grade with one foot of barbed wire to comply with the National Electric Code, and to provide security and safety. Additional prairie dog exclusionary fencing options may be utilized in portions of the Project such as chicken-wire below the chain link fence extending below grade.</p> <p>The anticipated impacts of fencing on wildlife are described in Chapter 3 (Fish and Wildlife).</p>
5-4	4/2/17	Izaak Walton League of America	The project proposes to leave and enhance the prairie grasses and the existing prairie dog towns on the site. We also ask that the EA to look at also adding or enhancing pollinator habitat on this site.	Wild Springs has developed several seed mixes for revegetation efforts. Details of these seed mixes can be found in Appendix B. The seed mixes were developed in coordination with the South Dakota U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) and includes seed mixes specific to clay and loam soils and plant species that are adapted to the semi-arid climate. Some plants species in the seed mixes are beneficial to pollinators.
5-5	4/2/17	Izaak Walton League of America	We request the EA to examine all possible impacts to area wetlands and water quality including possible erosion from the site both during construction and after completion.	Wetlands and water quality are described in Chapter 3 (Water Resources).
5-6	4/2/17	Izaak Walton League of America	The EA should address all possible impacts to historic and cultural resources including seeking input from tribes and other affected stakeholders regarding this topic.	Historic and cultural resources are described in Chapter 3 (Cultural Resources). WAPA invited participation from 12 tribes; The Cheyenne River Sioux tribe expressed interest in the Project and consultation is underway. Details of tribal consultation can be found in Chapter 4.
5-7	4/2/17	Izaak Walton League of America	Recreation and other Social, Economic and Environmental Topics. We ask the EA also include these topics and explore possible impacts to all of them.	There are no recreation opportunities within the Project boundary, so recreation was not analyzed in detail. Social and economic factors are evaluated in Chapter 3 (Socioeconomics).
5-8	4/2/17	Izaak Walton League of America	The Division understands the proposed project would have a weather station and an operation and maintenance facility on the site. We request the EA address possible environmental impacts of the footprint of these structures.	These facilities are included in the Project footprint. See Chapter 2 for a complete description of the footprint and facilities.
5-9	4/2/17	Izaak Walton League of America	The South Dakota Division of the Izaak Walton League of America thanks you the opportunity to provide scoping comments on the Wild Springs Solar Project. We look forward to the release of the Environmental Assessment for the project and for your consideration of our comments.	Comment noted.
6-1	Undated	Center for Rural Affairs	<p>It is key that developers work closely with local stakeholders to identify sensitive environmental areas and derive mitigation measures to address potential impacts. For example, the Center encourages the installation of native vegetation on solar sites such as the proposed Wild Springs Solar Project. Native plantings can reduce aesthetic and land use concerns associated with solar development, and when firmly established, solar projects planted with the right mix of native vegetation will be complimentary to both conservation and economic development goals.</p> <p>Modest investments in native vegetation can also have significant benefits for at-risk pollinators like bees and monarch butterflies, as well as game birds such as pheasants. Employing native vegetation as a site management practice may provide these species with additional habitat, off-setting habitat loss in the area. Additionally, there are measurable improvements in water quality and soil health when perennial vegetation is implemented. In particular native vegetation can be used to minimize erosion due to their extended root systems, benefiting project sites as well as the surrounding area.</p>	Wild Springs has developed several seed mixes for revegetation efforts. Details of these seed mixes can be found in Appendix B. The seed mixes were developed in coordination with the South Dakota U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) and includes seed mixes specific to clay and loam soils and plant species that are adapted to the semi-arid climate. Some plants species in the seed mixes are beneficial to pollinators.

7-1	3/3/20	United States Department of the Interior, Bureau of Indian Affairs, Great Plains Regional Office	This is in response to your letter of February 11, 2020, concerning the Wild Springs Solar Project. We have considered the potential for both environmental damage and impacts to archaeological and Native American religious sites on lands held by the United States of America in trust on behalf of the Tribe and within the administrative jurisdiction of the Great Plains Region. We have no environmental objections to the actions as long as the projects comply with all applicable laws and regulations. You should be aware; however, that Tribes or Tribal members may have lands in fee status near the sites of interest. These lands would not necessarily be in our databases, and the Tribes should be contacted directly to ensure all concerns are recognized. The actions considered have the following project names: February 11, 2020: Project Name: Wild Springs Solar Project	Comment noted.
7-2	3/3/20	United States Department of the Interior, Bureau of Indian Affairs, Great Plains Regional Office	We also find that the listed action will not affect cultural resources on Tribal or individual landholdings for which we are responsible. Methodologies for the treatment of cultural resources now known or yet to be discovered - particularly human remains - must nevertheless utilize the best available science in accordance with provisions of the Native American Graves Protection and Repatriation Act, the Archaeological Resources Protection Act of 1979 (as amended), and all other pertinent legislation and implementing regulations.	Comment noted.
	4/22/20	Private citizen	I see I am very late to submit an evaluation of the meeting on March 3, 2020. Myself and several others (3 to 4 of us) had a pleasant visit with Christina. The stand-around meeting was ok but think our general feeling was that it would have been beneficial if it would have been a sit-down presentation where people could have asked questions of the presentors present and heard answers. Everybody could gain more. As it was - if you didn't walk up to a group clustered around a representative, you didn't get much info. Personally, I don't care to walk up to a group in conversation and feel as if I'm breaking in to a conversation and sticking my nose in. I did hear a few of our local residents asking good questions and had it been i a presentation to the group with answers by representatives, I believe everybody would benefit. Thank you and I will look forward to reviewing the web link to a NEPA document.	Comment noted. WAPA will consider the feedback when planning future meetings as either open-house or presentation style.
8-1	Undated	Private citizen	Are any of the materials recyclable in the panels?	More than 90 percent of the semiconductor material and glass from the panels can be reused in new modules and products (recyclable). Other project components can also be recycled. More information on recycling can be found in Chapter 2 (Proposed Action).
9-1	7/22/20	Private citizen	<p>Hello,</p> <p>I'm resident of New Underwood. I listened to your call a few weeks ago. It was nice to listen to guys want to be involved in the community but let's be honest throwing \$25,000 scholarships to students isn't being a part of community. New Underwood High School in the next four years the highest number of graduates it will have is 28 students and out the of the 28 students half them will not attend college. If you are going to be a make a giant eye sore just outside our city limits. You could help with maybe rebuilding or upgrading the football field or rodeo grounds, help build a community center that children can use, or just do something for the whole community to enjoy instead of a few people. Then on top of the eye sore, bringing in stinky sheep in to graze down the land. Land value around the area is going to go the drain. This project coming into town is only helping your company and few landowners make a lot of money. Thank you for your time.</p>	<p>Thank you for your comments. I apologize, but I believe you have written to WAPA (a federal agency under the Department of Energy) confused with the South Dakota Public Utilities Commission (SD PUC), which held a public input hearing on July 1st. Their website is located here: <a href="https://puc.sd.gov/Dockets/Electric/2020/EL20-018.aspx">https://puc.sd.gov/Dockets/Electric/2020/EL20-018.aspx</a> and the Commission is accepting comments in writing from anyone, either by mail, personal delivery, or e-mailing the Commission right up until the time of the decision. Their contact information is:</p> <p>Public Utilities Commission Capitol Building, 1st floor 500 E. Capitol Ave. Pierre, SD 57501-5070 Phone Numbers: □ Routine Business (605) 773-3201 Grain Warehouse Program (605) 773-5280 Consumer Affairs (800) 332-1782 □</p> <p>WAPA's role in the project is limited to Wild Spring Solar's request to interconnect with WAPA's existing New Underwood Substation. If there is available transmission capacity on the federal transmission system, WAPA provides open access to transmission services so that energy producers can transmit power to their customers. Any entity requesting transmission services must submit an application for interconnection. The decision to approve or deny the interconnection is a federal action subject to the National Environmental Policy Act (NEPA), and thus, an Environmental Assessment (EA) is being prepared to evaluate the environmental effects of the Project. WAPA's NEPA process is separate from the SD PUC process.</p>
<b>Draft EA Comments</b>				
1	5/10/2021	Federal Highway Administration, South Dakota Department of Transportation	<p>Thank you for the opportunity to provide input on the proposed Wild Springs Solar Project near the town of New Underwood, SD.</p> <p>Project is located less than a mile south of I-90 but the draft EA's Propose Action did not identify any potential for direct or casual impacts to any Federal-aid highway system routes in or around the Project boundaries.</p> <p>The FHWA – SD Division has no comments to provide to the draft EA for Project. Should the Project identify potential to affect the safety and performance of the Federal-aid highway infrastructure then please get in direct contact with the FHWA and the South Dakota Department of Transportation so that an appropriate course of action can be decided upon.</p>	Comment noted.

2-1	6/1/2021	Center for Rural Affairs	<p>The Center for Rural Affairs is a private non-profit organization that works to promote opportunity. We engage people in decisions that affect their community and the quality of their lives. This includes working to expand deployment of renewable energy generation and utilize these investments for the improvement of rural quality of life.</p> <p>Utility-scale solar energy, such as the Wild Springs Solar Project, presents an opportunity to demonstrate how renewable energy and conservation can go hand in hand. By combining environmentally beneficial management practices, the 1,100-acre footprint of the Wild Springs Solar Project can be leveraged as an investment in the conservation of natural resources.</p> <p>The draft environmental assessment issued by the Western Area Power Authority states that the site would be re-vegetated with site-specific, native seed mixes and managed through either mowing or grazing (Chapter 2: Proposed Action and Alternatives-Restoration, Facility Maintenance; Chapter 3: Affected Environmental Consequences-Land Use and Land Cover; and Appendix B: Vegetation Management Plan).</p> <p>The Center agrees with and encourages the installation of native vegetation on solar sites. Native plantings improve soil health, reduce runoff, improve water quality, and provide habitat for pollinators and wildlife. Mixes that contain a variety of species with staggered bloom times throughout the season will be most beneficial to pollinators. Incorporating native vegetation at solar sites has the potential to decrease operation and maintenance costs significantly. According to the National Renewable Energy Laboratory, developers utilizing perennial vegetation can expect to spend up to three times less on maintenance and operational costs compared to managing a turfgrass site.</p>	<p>Wild Spring's intends to use native seed mixes. The Vegetation Management Plan, included as Appendix B to the Draft EA, details the native seed mixes to be used in areas of ground disturbance. Additionally, as discussed in the Geology and Soils and Land Use and Land Cover sections, much of the existing herbaceous land cover will remain in place with solar panels above the ground, except for areas that require grading due to slopes.</p>
2-2	6/1/2021	Center for Rural Affairs	<p>The Center encourages the utilization of grazing versus traditional mowing as a way to decrease management costs while also improving soil health and supporting local farmers. A robust rotational grazing plan is recommended, with sheep being the preferred livestock choice as they pose the lowest risk to equipment.</p>	<p>As described in the Vegetation Management Plan, Wild Springs is still considering sheep grazing as a long-term vegetation management technique. Implementing this perpetual maintenance strategy will depend on the availability and willingness of a local farmer to partner, and several logistics such as insurance, flock size, water sources, and grazing objectives. The Project is anticipated to be operational by December 2022; implementation of sheep for long-term maintenance would occur at least three years following native vegetation establishment (2025). Wild Springs remains open to utilizing sheep for long-term maintenance as the Project continues to develop.</p>
2-3	6/1/2021	Center for Rural Affairs	<p>The draft environmental assessment identifies wildlife impacts and states that the project would consider other measures to enhance wildlife habitat such as installing nest boxes or allowing beekeeping (Chapter 3: Affected Environment and Environmental Consequences-Environmental Commitments). The Center encourages the adoption of both of these practices, and also urges utilization of deer fencing instead of the planned chain link fencing identified in the project plan (Chapter 2: Proposed Action and Alternatives-Fencing &amp; Cameras).</p>	<p>Comment acknowledged. In its April 3, 2020 letter to WAPA, South Dakota Game, Fish and Parks recommended implementation of a woven wire/chain link fence at least 7-8' tall to exclude deer and antelope. As discussed in the Draft EA, Wild Springs will implement a six-foot chain link fence with an additional one foot of barbed wire for a total of 7-foot fence.</p>
2-4	6/1/2021	Center for Rural Affairs	<p>Allowing beekeeping at the site is beneficial for increasing the populations of at-risk pollinators, valuable to producing a local crop, and, ultimately, investing in the local economy. The installation of other features such as bird and bat boxes increases wildlife habitat availability at the site. The utilization of deer fencing instead of chain link reduces impacts to wildlife and allows easier movement of small wildlife, such as ring-necked pheasants, through the area.</p> <p>Wildlife generally responds more to the structure of vegetation instead of specific plant species. Seed mixes containing too many grasses could restrict the navigability of the site for upland nesting birds, such as pheasants, negating the value of the site to these birds. When formulating a seed mix, site managers should evaluate the ratio of grasses to forbs to inform their seed selection process.</p>	<p>Wild Springs has developed several seed mixes for revegetation efforts. Details of these seed mixes can be found in Appendix B. The seed mixes were developed in coordination with the South Dakota U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) and includes seed mixes specific to clay and loam soils and plant species that are adapted to the semi-arid climate. Some plants species in the seed mixes are beneficial to pollinators. Additionally, Wild Springs includes a discussion of potential wildlife enhancements such as American kestrel and other bird nest boxes and bat boxes in the Natural Resources Strategy.</p>
3-1	6/1/2021	US Environmental Protection Agency, Region 8	<p>EPA has reviewed Western Area Power Administration's (WAPA's) April 2021 draft Environmental Assessment (EA) on the proposed Wild Springs Solar Project (Project), including appendices, maps and other scoping materials on WAPA's Project website and publicly available information about the Project found in the South Dakota Public Utilities Commission's Docket EL20-018. In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we are providing comments on the draft EA. These comments identify questions and concerns that we recommend be addressed in the final NEPA document issued by WAPA for the Project. We remain dedicated to working with you to develop ideas for addressing our comments efficiently.</p> <p>Wild Springs Solar, LLC (Wild Springs) has requested interconnection of its proposed Wild Springs Solar Project (Project) to WAPA's existing New Underwood Station. The Project would involve construction of a 128-megawatt (MW), alternating current (AC) solar photovoltaic (PV) energy generating facility that includes approximately 340,000 solar PV panels and associated inverters, tracking rack system, electric collection lines, and approximately 1-mile of 115-kV overhead gen-tie transmission line leading to WAPA's substation. Other Project components include fencing, up to three (3) weather stations, access roads, an operations and maintenance facility and parking area. The Project would be constructed on roughly 1,499 square acres of private land located ½-mile south from the town of New Underwood in Pennington County, South Dakota.</p> <p>EPA understands that the proposed interconnection of the Project to WAPA's transmission system is a Federal action under NEPA. As a result, WAPA is overseeing the preparation of an Environmental Assessment (EA) that will evaluate the environmental effects of the proposed Project. If WAPA finds there are no significant environmental impacts, the interconnection request would be granted and WAPA would prepare a Finding of No Significant Impact (FONSI) to support its interconnection request decision. Based on our review, EPA's comments on the draft EA are as follows:</p>	<p>Comment noted.</p>
3-2	6/1/2021	US Environmental Protection Agency, Region 8	<p>Discharge of dredged or fill material into waters of the U.S., including wetlands, is regulated under Clean Water Act (CWA) Section 404. This permit program is administered jointly by the U.S. Army Corps of Engineers (USACE) and the EPA. We recommend that Wild Springs and WAPA consult with USACE to make a final determination as to the applicability of CWA Section 404 permit requirements to delineated wetlands that would be impacted by any new solar facility or road construction in the Project area. EPA encourages this coordination well before the completion of the final NEPA document. This is particularly important for Wild Springs given that the South Dakota Department of Environment and Natural Resources' decision regarding the Project's CWA Section 401 Water Quality Certification is dependent upon whether a National CWA Section 404 Permit would be issued by USACE for the proposed Project. The final EA should provide sufficient, timely information to support decisions in compliance with the EPA's CWA Section 404(b)(1) Guidelines, thereby supporting the timely permitting of the proposed Project and Wild Springs Project operation by the projected in-service date.</p>	<p>Wild Springs Solar has received a Jurisdictional Determination from the USACE. The final Project design and construction methods are anticipated to avoid impacts to all jurisdictional waters. If impacts to jurisdictional waters are necessary, Wild Springs will coordinate with the USACE and South Dakota DEQ on Section 404/401 permitting.</p>

3-3	6/1/2021	US Environmental Protection Agency, Region 8	<p>The EPA recommends that the final EA describe how the Project would be affected by foreseeable changes from predictable trends to the affected environment, for instance, under a scenario of continued decreasing precipitation days, changing frequency of intense storms and related flood events, and enduring drought in the Project area.</p> <p>We recommend that WAPA and Wild Springs analyze potential impacts of current and predictable trends to the proposed action's affected environment associated with the proposal and its alternatives. The US Climate Resilience Toolkit (<a href="https://toolkit.climate.gov/">https://toolkit.climate.gov/</a>) serves as a repository of information related to climate resilience in the U.S., including steps to build resilience, case studies, expertise, and special topic areas, including renewable energy technology development. In addition, we suggest that this Project consider resiliency and adaptation measures based on how future climate may impact the Project and the ability of Wild Springs to effectively protect Project infrastructure and resources from unintentional deleterious impacts due to continuing and foreseeable climate trends in the proposed Project area. The Fourth National Climate Assessment (NCA), released by the U.S. Global Change Resource Program (<a href="https://nca2018.globalchange.gov/">https://nca2018.globalchange.gov/</a>), contains scenarios for regions and sectors that may be useful to Wild Springs and WAPA in responding to this recommendation. Full consideration of influences from the Project setting on the proposed Project may inform necessary design modifications (e.g., using resilient steel monopoles for the 115-kV gen-tie line rather than wooden structures to ensure reliable electricity delivery to ratepayers over the projected 20-year Project lifespan), and changes to operational assumptions for determining resource supplies, system demands, system performance requirements, and operational constraints.</p>	Additional text has been added to the Greenhouse Gases and Climate Change section of the Draft EA to clarify that changes in climate are not expected to impact the resiliency or operations of the Project. The monopole wooden structures will be treated wood, which is designed to withstand weather events including wind and rain over the anticipated life of the Project. Additionally, besides the steel lattice structures near the WAPA substation, wood poles are consistent with other transmission lines in the area.
3-4	6/1/2021	US Environmental Protection Agency, Region 8	<p>The final EA should have clear and concise conclusions and may incorporate by reference data, survey results, inventories, and other information that support these conclusions, so long as this information is reasonably available to the public. We recommend that all technical reports - including appropriate publicly available documents from the South Dakota PUC docket for the proposed Project - that lead to conclusions regarding environmental consequences be included as appendices to the NEPA document available through the WAPA Project website. Further, the information in the references and appendices should be consistently cited in the environmental consequences' discussion in the final EA.</p> <p>Given the fact that the South Dakota PUC issued the siting decision and related construction permit which includes several required conditions related to avoidance, minimization and mitigation that must be fulfilled by Wild Springs and are directly relevant to the current NEPA analysis, the entire Project permitting process and related decisions should be fully disclosed in the final EA. Doing so will help WAPA provide the public and Project stakeholders a more accurate decision-making context and untangle an, at times, complicated interagency regulatory landscape within which the Project is planned and allows the public to identify the responsible part(s) related to essential mitigation actions that may be necessary for WAPA to make a possible decision to issue a FONSI defensible.</p> <p>We further recommend that this information be made available at the time of the release of a final EA so that all conclusions about environmental effects may be clearly supported by the data, facts, and analyses completed for the proposed Project. In addition, references pointing the reader to the appropriate technical report and/or documentation in the appendices is necessary to support many conclusion regarding impacts (or lack thereof) sufficiently in the body of the EA. Providing consistent citations to all technical documents in publicly-accessible appendices as well as information in the environmental consequences discussion helps to ensure a comprehensive picture of the Project for the public and the decision makers while keeping the environmental document succinct and in accordance with the updated Council of Environmental Quality (CEQA) NEPA Implementing Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508).</p>	Additional text was added to the Final EA about the Facility Permit with a link to the SD PUC docket in a footnote.
3-5	6/1/2021	US Environmental Protection Agency, Region 8	Finally, EPA recommends that a list of preparers for the NEPA documentation be included in the Final EA as required by CEQ NEPA Implementing Regulations at 40 CFR 1502.8.	Comment noted. Chapter 4 included a List of Preparers and their roles.
4-1	6/1/2021	US Fish & Wildlife Service	Thank you for the opportunity to review and comment on the Draft Environmental Assessment (DEA) for the Wild Springs Solar project, a proposed solar photovoltaic energy facility on 1,499 acres of private land near New Underwood in Pennington County, South Dakota. Fenced-in tempered glass photovoltaic panels for this proposed facility would cover 1,037.5 acres (1.62 mi <sup>2</sup> ) of land with an additional 70.6 acres of impact area due to roads, collection lines and other facilities (1,108 acres or 1.7 mi <sup>2</sup> total). The DEA indicates that 815 acres (79%) of the proposed impact area is currently herbaceous (grassland) cover.	Comment noted.
4-2	6/1/2021	US Fish & Wildlife Service	<p>Our coordination with the project developer, Geronimo, included a July 2, 2017, letter and a January 22, 2020, meeting. We provided a copy of the 2017 letter as an attachment to our March 9, 2020, letter to your agency on this project prior to development of the DEA. In each of these coordination instances, we have relayed the concern for grassland habitat and associated migratory bird impacts at the proposed project location, recommending avoidance and compensation for any unavoidable impacts. Due to the difficulty in fully replacing functional native grasslands, compensation for lost or degraded grasslands is recommended only after all measures have been taken to avoid the habitat as much as possible. Much of South Dakota's grasslands have already been lost or degraded by development, resulting in increased rarity of native grassland habitats and increased importance of conserving remaining remnants for many grassland-dependent species.</p> <p>However, it does not appear that project development has included efforts to avoid or compensate for grassland impacts. The project area, which is dominated (75.5%) by grasslands, has not been shifted away from this habitat, and the proportion of grasslands affected appears to be in line with its availability in the project area. The DEA discusses and quantifies grassland impacts and fragmentation due to the proposed project, but makes no mention of compensation for the loss, does not include a compensation plan, and fails to address the overall conservation concern for grasslands and grassland habitats. Further, while the proposed post-construction wildlife studies may be helpful in identifying the level of wildlife impact at this facility, the studies lack an associated commitment by Geronimo to apply the resulting data and develop offsetting measures that may be needed to compensate for grassland loss and degradation. The lack of mitigation in the forms of avoidance, minimization, and compensation is a significant and relevant missing component of the DEA.</p>	<p>WAPA appreciates the concern for grassland habitat, it's increased rarity, and conservation importance for associated migratory birds. WAPA would welcome the opportunity to collaborate with USFWS to develop a larger strategy to address these concerns at the UGP scale, so that they can be meaningfully addressed in future projects.</p> <p>Wild Springs Solar recognizes the avoidance recommendation, and additional text was added to the Proposed Action Section on selection of the Project Area. Grassland avoidance is one of many factors considered in siting a project. However, the Project does not intend to prepare or implement voluntary mitigation or compensation plans for migratory birds or grasslands, through fee title land purchase, or easement-establishment. Siting avoidance, grading minimization, and reseeded measures are appropriately identified in the DEA.</p>

4-3	6/1/2021	US Fish & Wildlife Service	<p>A recent analysis of birds of North America revealed a net loss of 29% or 2.9 billion birds across almost all biomes since 1970, with grassland birds showing the largest magnitude of total population loss since 1970: more than 700 million breeding individuals across 31 (74%) of grassland species equating to a 53% proportional loss (Rosenburg et al. 2019). Species identified as Birds of Conservation Concern (USFWS 2008) and South Dakota Species of Habitat Fragmentation Concern (Bakker 2020) are known to occur at the project site. Habitat loss and fragmentation at this nearly two square mile project area are expected to impact these species at the project location.</p> <p>The documented decline in grassland birds is why prairie habitat and associated prairie wildlife are of primary conservation concern in South Dakota. It is the reason our agency has consistently conveyed to the developer of this project, and to WAPA, the need to avoid this habitat and compensate for any unavoidable impacts. If the project moves forward as planned, the trending loss of grasslands and grassland birds in South Dakota should be analyzed in the EA, along with the recognition that this project will contribute to that decline. A robust habitat compensation plan to mitigate any remaining unavoidable wildlife habitat loss or degradation caused by this facility should be developed and included in the final EA. These actions would lend appropriate and necessary support for a potential Finding of No Significant Impact under the National Environmental Policy Act.</p> <p>Lack of mitigation for grassland degradation and loss from the proposed project runs contrary to Executive Order 14008 and the goals outlined in the subsequent America the Beautiful Report (DOI 2021). Executive Order 14008 "Tackling the Climate Crisis at Home and Abroad" directs the Federal Government to address climate change in a variety of ways, including advancement of conservation as a tool to enhance carbon sequestration. It also directs the development of the "America the Beautiful Report" (Report), which outlines a 10-year national campaign to conserve at least 30 percent of our Nation's lands and waters by 2030. The Report identifies the importance of protecting and conserving habitats to stem the crisis of biodiversity loss in North America.</p>	<p>Migratory birds, including grassland birds of fragmentation concern, are discussed in the draft EA. Wild Springs conducted one year of pre-construction grassland breeding bird surveys and will conduct two years of post-construction breeding bird surveys to determine if any displacement or change in avian use has occurred. These post-construction survey results could be used to inform siting of future projects with similar scope and impact potential.</p> <p>EO 14008 has three overarching objectives 1) promote safe global temperature, 2) increase climate resilience, and 3) support financially a pathway toward low greenhouse gas emissions and climate-resilient development. WAPA believes that solar development is aligned with the goals of EO 14008 to "increase renewable energy production on [public] lands and waters" and recognizes that Agencies are sometimes given competing directives, as with protecting grasslands and promoting new energy development.</p> <p>Although additional voluntary mitigation measures may exist (such as the acquisition of easements, as FWS suggests), they are outside the jurisdiction of WAPA and are inappropriate to impose as an enforceable permit condition. Compensation and mitigation for grassland degradation is not required by law or regulation. Prior to making a decision on the Federal action, WAPA will determine if additional mitigation is necessary to support a Finding of No Significant Impact under the National Environmental Policy Act.</p>
4-4	6/1/2021	US Fish & Wildlife Service	<p>Overall - The DEA presents only two alternatives: the preferred alternative, and "no action" alternative. While an EA does not necessitate the rigor of an Environmental Impact Statement analysis, we suggest more environmentally friendly alternatives for this project exist and should be presented in the EA; primarily one that would allow the project to continue, but would be sited on previously disturbed lands instead of grasslands.</p>	<p>The EA presents 3 alternative project layouts in addition to the Proposed Action and No Action alternatives (see Figure 2 and Chapter 2 - Alternatives Considered but Eliminated from Further Study). Although previously disturbed lands exist in the general area, Wild Springs' ability to site a project is limited based on a number of factors including voluntary easements with private landowners, proximity to transmission interconnection availability, cultural resources, wetlands and waterbodies, residences, zoning, and land cover/land use, including grasslands.</p>
4-5	6/1/2021	US Fish & Wildlife Service	<p>DEA p. 16 – Livestock fences and transmission lines are described as currently fragmenting the landscape. That statement seems misleading given that livestock fences and transmission lines are permeable to most wildlife species and do not fragment the herbaceous lands to the same degree as would croplands, roads, or the tall impermeable fencing proposed by the project (as acknowledged on p. 32).</p>	<p>Comment noted.</p>
4-6	6/1/2021	US Fish & Wildlife Service	<p>DEA p. 18 and 23 - Tree removal is proposed; dates are restricted to June 1-July 31 for protection of bats. We recommend extending those dates to include more species and more habitats, particularly to address the nesting season for migratory birds. Some species may nest as early as February while others may still be raising broods in August.</p>	<p>Wild Springs anticipates clearing the limited trees in the Project Footprint during Fall 2021, coinciding with the construction schedule.</p>
4-7	6/1/2021	US Fish & Wildlife Service	<p>DEA p. 18 - Vegetative restoration efforts are slated to last only three years. Three years is an artificial constraint that should be removed; these actions should be conducted for as long as necessary to ensure establishment of self-sustaining native vegetation.</p>	<p>The three year restoration-timeline is consistent with the typical permit duration of a National Pollutant Discharge Elimination System Permit and its associated Stormwater Pollution Prevention Plan. Additionally, three years is the typical timeframe for native seeds to fully establish.</p>
4-8	6/1/2021	US Fish & Wildlife Service	<p>DEA p. 25 - No grouse leks were documented in an initial survey, but the DEA indicates the second survey found no grouse leks in the project area – the final EA should specify the distance of grouse detected in relation to project area. Individual grouse were observed during surveys, thus the species uses the project area, perhaps as nesting or foraging habitat. Lek surveys are a relatively easy way to detect prairie grouse, but these sites are only part of the habitat used by these birds. Loss of grouse feeding, sheltering, and breeding habitat should be discussed in the DEA, as well as impacts to grouse as a species of habitat fragmentation concern.</p>	<p>Prairie grouse surveys were conducted in 2017 and 2020 based on protocols approved by SDGFP. In both years of survey, no leks or lekking behavior was observed. There were 6 incidental observations of roosting sharp-tailed grouse in the Project area, but no lekking behavior or concentrated signs of lekking were observed. Complete loss of grouse feeding, sheltering, and breeding habitat is expected across the 1,130 acres, as clarified in the EA. Sharp-tailed grouse are not discussed in the grassland birds section because they have their own section, but as mentioned in that section they are a species of habitat fragmentation concern, and it is understood that "separation of their habitats into smaller blocks reduces connectivity such that the individuals in the remaining habitat segments may suffer from effects such as decreased survival, reproduction, distribution, or use of the area," as clarified in the EA.</p>
4-9	6/1/2021	US Fish & Wildlife Service	<p>DEA p. 26 and 53 – The swift fox is not a candidate for federal listing under the Endangered Species Act (ESA); this former designation was removed in 2001. No ESA protections have been afforded the species. The online link provided in the DEA to access additional swift fox information (p. 53) is no longer operational.</p>	<p>The final EA has corrected the listing status of this species.</p>
4-10	6/1/2021	US Fish & Wildlife Service	<p>DEA p. 30 - Commitment to post-construction studies is mentioned, but the word "or" appears to suggest that there may be an alternate strategy. This needs clarification.</p>	<p>The final EA has removed this erroneous word.</p>
4-11	6/1/2021	US Fish & Wildlife Service	<p>DEA p. 30 - Commitments to actions based on study results are lacking. Studies are helpful, but by themselves, they are not mitigation. We recommend adding the commitment to use study results to determine appropriate mitigation measures.</p>	<p>Wild Springs conducted surveys for raptor nests, prairie dog colonies, wetlands and waterbodies, and prairie grouse. The results of these studies informed the design of the Project such that all of these resources are avoided. Additionally, the post-construction study protocol was developed in coordination with SDGFP and the results of two-year study will be provided to both SDGFP and USFWS.</p>
4-12	6/1/2021	US Fish & Wildlife Service	<p>DEA p. 31 –We recommend adding a commitment to avoid project initiation during the breeding season.</p>	<p>Wild Springs will make efforts to begin construction prior to the breeding season and/or delay construction until after the breeding season. However, contractual commitments regarding the Project in-service date and the overall construction schedule may make complete avoidance of the nesting season impractical. Further, the NRS describes a commitment to inspect construction equipment/materials that could be used during the nesting season and avoiding (to the extent practicable) any new and active nests that are found.</p>
4-13	6/1/2021	US Fish & Wildlife Service	<p>Appendix A - Natural Resource Strategy (NRS) p. 3 - Update the current status of Migratory Bird Treaty Act incidental take and M- opinion as described in the DEA.</p>	<p>Comment acknowledged. The Natural Resource Strategy has been updated to match the language in the DEA and the current status of the MBTA.</p>

4-14	6/1/2021	US Fish & Wildlife Service	NRS p. 4 – In the Early Coordination with Agencies each coordination event with our agency included the recommendations to avoid grasslands and compensate for unavoidable impacts to those habitats. This section should mention those recommendations.	The Natural Resources Strategy (Appendix A) summarizes agency coordination and includes comment letters as an appendix. The Early Stakeholder Communication section (Section 1.4) is meant to provide an overview and summary of the agency communications that have occurred for the Project. A reference to Appendix A has been added to Section 1.4 to ensure these additional details can be easily found. Table 1 has also been updated to include reference to these June 2021 comments from the USFWS.
4-15	6/1/2021	US Fish & Wildlife Service	NRS multiple locations – complete a document search for least tern and update its status; this species has been delisted.	The NRS has been updated to reflect the delisting of the interior least tern. Table 4 and Section 2.2.1 have been modified to note that the interior least tern was identified during the IPaC review in 2020, but the species has since been delisted due to species recovery. The NRS no longer provides additional information for this species due to the official delisting.
4-16	6/1/2021	US Fish & Wildlife Service	NRS p. 25-26 - To suggest that native birds, particularly small birds, will continue to use the area is premature. Obligate grassland nesting species often avoid large objects on the landscape and it is likely many would do so at this solar facility.	Wild Springs conducted one year of pre-construction grassland breeding bird surveys and will conduct two years of post-construction breeding bird surveys to determine if any displacement or change in avian use has occurred. The NRS has been updated/modified so that the document does not speculate how the native bird community might or might not respond to the development of this facility. The pre- and post-construction research study will be essential for understanding how the bird community is responding to this Project, and other solar projects in the northern Great Plains.
4-17	6/1/2021	US Fish & Wildlife Service	NRS p. 27 – The APLIC guidelines to reduce electrocutions are mentioned, we also recommend application of APLIC guidelines to reduce collision mortality with overhead powerlines.	While Wild Springs plans to follow APLIC guidelines to reduce electrocution risk, several factors associated with the Project’s proposed 115kV transmission line support the premise that no line marking (i.e., installation of Bird Flight Diverters) would be warranted for the less than a quarter mile 115kV generation-tie line. No habitats or surface features in proximity to this generation-tie line appear of sufficient value to attract high concentrations of migrating birds; similarly, the extent of proposed solar arrays would surround this line, reducing the potential for concentrated, seasonal bird movement. An estimated six large, existing transmission lines are already associated with the existing substation; therefore, the new short 115kV line would not introduce a new or significantly different aboveground line to the area. As such, no changes have been made to the language in the NRS.
4-18	6/1/2021	US Fish & Wildlife Service	NRS p. 27 – It is suggested that big game animals will move between the fencing; please provide supporting information and/or a means to evaluate this.	This statement is intended to reflect that big game could move through the project area as blocks of panels will be fenced rather than nearly two square miles. The NRS (section 3.2.2) has been updated to add additional references related to large ungulate movement and fencing studies. While there may be some displacement or loss of habitat for big game, Wild Springs is not aware that the solar facility will interrupt any known existing migration corridors for white-tailed deer, mule deer, or pronghorn.
4-19	6/1/2021	US Fish & Wildlife Service	We acknowledge that some adjustments have been made to reduce harm to wildlife, including moving the Wild Springs Solar Project further from Box Elder Creek and from an existing prairie dog town, and the aforementioned post-construction wildlife studies have been developed to evaluate project impacts. We applaud these efforts and have provided Geronimo with our input to help ensure the wildlife studies garner useful data regarding impacts of this and future solar facilities in South Dakota. However, additional steps that we describe herein and in previous correspondence are needed to adequately avoid, minimize, and compensate for the environmental impacts from the proposed Wild Springs Solar facility.	WAPA believes the EA, with the minor changes made between the Final and Draft iterations, adequately describes the anticipated environmental impacts of the Proposed Action. Prior to making a decision on WAPA's Federal Action, WAPA will determine whether additional avoidance, minimization or compensation measures are required of the Project to reach a Finding of No Significant Impact or whether there are significant environmental impacts, in which case an Environmental Impact Statement will be prepared.