

6 Unavoidable Adverse Impacts

Unavoidable adverse impacts are those that would occur after implementation of all incorporated BMPs, APMs and mitigation measures. Unavoidable adverse impacts do not include temporary or permanent impacts which would be mitigated.

The Applicants and Western have committed to implementing BMPs and APMs to minimize or eliminate potential impacts from constructing and operating the Proposed Project Components. If additional impacts are identified through other Federal, State or County permitting processes, the Applicants would develop appropriate mitigation measures in consultation with the requesting agency (*i.e.*, USFWS, USACE). Constructing and operating the Proposed Project Components would unavoidably convert less than 0.4 percent of available farmland within the site alternative's boundary. Loss of this agricultural farmland would have a minimal effect on the overall agricultural production in the area.

Constructing, operating and maintaining the Proposed Project Components may result in unavoidable adverse impacts to biological resources and cultural resources as described below. The Proposed Project Components would have a less than significant impact on the other resource areas as identified in **Chapter 4**.

Some biological resources would be lost due to the construction and operation of the Proposed Project Components. Construction would result in the permanent loss of a small amount of native vegetation and wildlife habitat. Operation of the Proposed Project Components would likely result in avian and bat mortalities. A BA has been prepared for consultation with the USFWS, in accordance with Section 7 of the ESA, for the preferred alternative (the Crow Lake Alternative, see **Section 2.8**), including the Proposed Project and Wind Partners' proposed development. The BA was submitted to the USFWS by RUS on February 22, 2010, with a determination that the Proposed Project Components could adversely affect the whooping crane. Based on USFWS reply to the BA, on March 16, 2010, RUS and USFWS have entered formal consultation on the Proposed Project and the Wind Partners' proposed development. Upon completion of formal consultation, the USFWS will issue a BO. The results of the BO will be addressed in Western's and RUS's RODs.

Potential impacts to cultural resources, such as prehistoric properties, historic properties, and cultural landscapes, were identified in the results of the Class III Survey, survey of historic architectural properties within the Proposed Project Components viewshed, and TCP Survey that were completed for the preferred alternative (Crow Lake Alternative). Agreements are being developed to ensure avoidance and/or mitigation of adverse effects to historic properties. These agreements are being developed among Western, RUS, SHPO, affected Federal agencies, Applicants, and all interested Native American Tribes. The preferred treatment of any potential TCPs and archaeological sites that are eligible for listing or remain unevaluated for the NRHP is to avoid these identified sites. Avoidance and monitoring protocol during construction would be included in an agreement. Viewshed impacts may occur on historic architectural or structural properties and would be mitigated through a MOA in accordance with 36 CFR 800.6.

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