



**South Dakota PrairieWinds Project
Environmental Impact Statement (EIS)**

Thank you for your interest in the proposed South Dakota PrairieWinds Project (Project). Please complete the appropriate sections of this form to be included on the Project mailing list and/or to provide comments. Written comments can be submitted at the Scoping Meeting, faxed to (720) 962-7263, mailed to the address on the back of this form or sent to the **Project Email Address: sdprairiewinds@wapa.gov**. Comments on the project scope and alternatives should be received by **May 15, 2009**, to be considered in defining the scope for the Draft EIS. For more information about the Project, please go to the **Project Website:**

<http://www.wapa.gov/sdprairiewinds.htm>.

- I would like to be kept informed of the ongoing progress of this Project. Please include my name on the mailing list.
- I prefer electronic/email communication.
- I prefer paper mailings.

Please Print Contact Info Below

<u>Name:</u> <i>Richard Shaffer</i>	<u>Organization:</u>
<u>E-mail address:</u>	<u>Daytime Phone No. (optional):</u>
<u>Street Address:</u>	<u>City / State / Zip Code:</u>

Please indicate any questions, comments or concerns you have about the Project in the comment section below (continue on separate sheet if necessary).

I am very interested in the possibility of wind energy in the Gregory - Tripp Counties of S. Dakota.

I understand that with the upgrade of transmission lines this is more possible.

Thank you for your time and interest in the South Dakota PrairieWinds Project.

INTERTRIBAL COUNCIL ON UTILITY POLICY

>>>> P.O. Box 224, Ft. Pierre, SD 57532 Phone: 605-280-7999 <<<<
President Patrick Spears < Bill Schumacher > Secretary Robert Gough <

April 28, 2009

Tim Meeks, Administrator
Western Area Power Administration
12155 W. Alameda Pkwy.
P.O. Box 281213
Lakewood, CO 80228-8213

Re: Notification by WAPA to Tribal Governments On Proposed Wind Energy Projects In the WAPA - UGPR

The Honorable Tim Meeks,

It has recently been brought to our attention through the Rosebud Sioux Tribe, one of the member Tribes of Intertribal COUP, that Basin Electric is proposing a 198 MW wind energy project at a site in South Dakota, one near Wessington Springs, SD or near Winner, SD. Scoping meetings on the intention to conduct an Environmental Impact Study under NEPA on this proposed project are scheduled for April 27-28, 2009 at these locations and in Pierre, SD sponsored by the Western Area Power Administration (WAPA) and the Rural Utility Service (RUS).

Our concern is one of policy and practice in the notification process to the Tribes conducted by WAPA and responsibilities in our government to government relationship as defined by the treaties with the United States government. A letter of notification on the proposed meetings was sent to the Bureau of Indian Affairs at Aberdeen who in turn notified some of the Tribes later last week.

It is our position that the Tribes should be notified directly on proposed wind projects on treaty lands and especially when then are proposed within the original boundaries of a federally recognized reservation, such as the Winner, South Dakota site, and almost more importantly, when those proposed projects will directly impact transmission capacity for tribal projects on the WAPA transmission system.

**Cheyenne River Sioux Tribe ⊕ Cheyenne River Telephone Authority ⊕ Flandreau Santee Sioux Tribe
Lower Brule Sioux Tribe ⊕ Northern Arapaho Tribe ⊕ Oglala Sioux Tribe ⊕ Omaha Tribe of Nebraska and Iowa ⊕
Rosebud Sioux Tribe ⊕ Sisseton-Wahpeton Oyate ⊕ Spirit Lake Sioux Tribe ⊕ Standing Rock Sioux Tribe ⊕ Three
Affiliated Tribes of Ft. Berthold ⊕ Turtle Mountain Band of Chippewa Indians ⊕ Yankton Sioux Tribe**

As you are aware from our involvement in the WAPA Wind and Hydropower Feasibility Study and from our recent meeting with you and your staff on the 400 MW Intertribal COUP Wind Project, both the Rosebud and Pine Ridge Indian Reservations are interested in wind

development and are arrayed on the 115 kV line that runs west through Winner from the Ft. Randall dam. Our position is that WAPA has the ability and obligation to negotiate directly with the Tribes on supplemental power purchases. As each project site requires interconnection studies and given the limited capacity on the WAPA transmission system, we request direct communication on proposed projects that will impact tribal plans for wind development and use of the WAPA grid system.

The Tribes are aware that non-tribal environmental organizations, weed control groups near the project sites for the EIS were contacted directly, while no Tribal governments nor Intertribal organization, such as Intertribal COUP, were included in any communications from WAPA. Intertribal COUP and the Tribes developing wind projects with the intent of interconnection to WAPA are offended by the oversight of your staff to notify us directly.

WAPA's own website at < <http://www.wapa.gov/newsroom/FactSheets/factsnative.htm> > notes its connections to western Tribes:

Native American power customers

More than 300 Native American tribes are located in Western's 15-state service territory, and 900 miles of transmission line cross reservations and tribal lands.
□ Nearly 100 tribes receive Federal hydropower allocations from Western.

We employ a full-time tribal liaison and conduct government-to-government consultations for National Environmental Policy Act and other actions. Tribes learn of energy development opportunities through Western and can take advantage of our resource planning assistance and other energy services.

This is precisely the type of "action" where we would expect Mr. Steve Tromly, WAPA's full-time tribal liaison, if not other staff members, to have had the awareness and interest to notify at least the interested Tribes of this proposal and public meeting. We are respectfully requesting that each Tribal government and Intertribal COUP be included in continued correspondence on the proposed Basin 198 MW wind project and any other wind generation projects that are on Tribal Treaty lands in the WAPA Upper Great Plains Region, and to the respective Tribes in the other WAPA regions, for that matter. We are sending a copy of this letter to the State Director of the USDA SD Rural Development Office.

Respectfully,



Patrick Spears, President

Cc: COUP Tribes

Jafar Karim, State Director
USDA Rural Development State Office
200 4th Street, SW, Federal Building, Room 210
Huron, SD 57350



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- I prefer paper mailings.

Please Print Contact Info Below

<u>Name:</u> <i>Dona Stukel</i>	<u>Organization:</u>
<u>E-mail address:</u>	<u>Daytime Phone No. (optional):</u>
<u>Street Address:</u>	<u>City / State / Zip Code:</u>

Please indicate any questions, comments or concerns you have about the Project in the comment section below (continue on separate sheet if necessary).

I attended a meeting held by a wind turbine development group and this meeting along with further research has led me to believe that this type of project would be very good for our community, state, and nation as a whole. I would like to encourage you to move forward as far as these type of energy projects are concerned. I believe it would be very beneficial to both those directly and indirectly impacted by the project.

[Signature]

Thank you for your time and interest in the South Dakota PrairieWinds Project.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

MAY 14 2009

Ref: 8EPR-N

Ms. Liana Reilly
NEPA Document Manager
Western Area Power Administration
Corporate Services Office – A7400
P.O. Box 281213
Lakewood, CO 80228-8213

Mr. Dennis Rankin
Project Manager
Engineering and Environmental Staff
Rural Utilities Service, Utilities Program
1400 Independence Ave. SW, Mail Stop 1571
Washington D.C., 20250-1571

RE: EPA Scoping Comments for Prairie Winds

Dear Ms. Reilly and Mr. Rankin:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed Western Area Power Administration's (Western) and Rural Utilities Service's (RUS) Environmental Assessment for the Prairie Winds SD1, Incorporated (Prairie Winds) proposed wind-powered generating facility in south-central South Dakota. In accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), and EPA's authority under Section 309 of the Clean Air Act, EPA offers the enclosed comments for your consideration.

Proposal

Prairie Winds', a subsidiary of Basin Electric Power Cooperative (Basin Electric), proposal for a 150-megawatt wind energy facility includes 101 wind turbine generators at a blade-height of 389 feet each, to be constructed in one of two sites under consideration. One site is located on approximately 37,000 acres and is 15 miles north of White Lake, South Dakota. An alternative site is located on approximately 83,000 acres and is 8 miles south of Winner, South Dakota. Basin Electric proposes to interconnect the proposed project with Western's transmission system and approximately 40 miles of new roads are expected to be built for this project.

Range of Alternatives

The EIS should summarize the criteria and process that were used to develop the proposed alternatives, including any environmental criteria used to identify potential sites. The EIS should also disclose the reasoning used to eliminate alternatives.

Environmental Concerns

Listed below are environmental issues commonly applicable to the proposed wind energy development project.

1. Protecting water quality

The EIS should clearly describe water bodies within the analysis area which may be impacted by project activities. An analysis of the area's geology, topography, soils and stream stability in terms of erosion and mass failure potential may be necessary to adequately evaluate the potential risks to surface and subsurface water quality and quantity, aquatic habitat, and other resources from specific project activities. The EIS should also include the construction, design and operational practices that will be incorporated into the project to protect water quality from erosion. Some examples include the need for a stormwater construction permit and design practices that will be used to minimize the erosion from turbine pad runoff, roads, culverts, etc.

Events during project construction, including road building, such as vehicular spills of hazardous or toxic materials could result in significantly more adverse habitat and water quality impacts. The EIS should describe vehicle maintenance facilities (if any), and spill and release response capabilities. Storm water management should also be evaluated. Specific BMPs should be implemented to protect water quality from storm water runoff, including contaminated runoff from construction and maintenance activities. Examples of these practices include the following:

- Preserve existing vegetation during clearing and grading;
- Divert upland runoff around exposed soils;
- Use sediment barriers to trap soil in runoff where sheet flows occur;
- Protect slopes and channels from gullyng;
- Install sediment traps and settling basins to reduce the velocity of channeled runoff;
- Store chemicals for project activities in covered containers in a specific location;
- Identify areas and procedures for fueling, and provide a protected vehicle washout;
- Preserve vegetation near all waterways; and
- Inspect the effectiveness of best management practices.

The EIS should provide information on Clean Water Act (CWA) Section 303(d) impaired waters in the project area, if any, and should describe existing restoration and enhancement efforts for those waters and any mitigation measures that will be implemented to avoid further degradation of impaired waters. The EIS should also disclose how the project proponent plans to coordinate with any on-going protection efforts. Maps outlining the project area(s) including road placement in relation to water resources is recommended to be included in the EIS.

2. Protecting wetlands and riparian areas and associated ecosystems

Under Section 404 of the CWA, a permit is required from the U.S. Army Corps of Engineers (Corps) for the discharge of dredge or fills material into waters of the U.S. We

recommend, that the EIS include the environmental analysis that might be needed to obtain a 404 permit, including the identification of potential wetlands both jurisdictional and non jurisdictional, development of a range of alternatives that includes the least damaging practicable alternative for avoiding wetlands, and development of a wetlands mitigation plan if needed. Under the Section 404(b)(1) guidelines, it is presumed that for non-water dependent activities there is an alternative available that will not impact waters of the U.S.

Executive Order 11990, "Protection of Wetlands," signed in 1978 and amended in 1988, addresses potential long and short-term adverse impacts associated with the destruction or modification of wetlands. In addition, the national wetlands policy has established an interim goal of "No Overall Net Loss of the Nation's Remaining Wetlands" and a long-term goal of increasing quantity/quality of the Nation's wetlands resource base ("Presidential Wetland Policy of 1993"). In accordance with the intent of the order and national policy, EPA suggests a mitigation commitment that indirect draining of, or direct disturbance of, wetland areas will be avoided if at all possible, and requiring complete avoidance of disturbance to any fen wetland (a Category I resource).

3. *Protecting air quality*

Protection of air quality should be addressed in the EIS. The EIS should present existing air quality conditions in the project vicinity, including criteria pollutants and air quality related values (AQRV). The amount of mobile and non-road source emissions activities should be quantified and disclosed. Particulate emissions from construction activities and ongoing operation of the roadways should also be addressed. The EIS should evaluate and disclose air quality impacts and, if necessary, detail mitigation steps that will be taken to minimize associated adverse impacts. This analysis should address and disclose the project's potential affect on all criteria pollutants (especially PM10 and PM 2.5) under the National Ambient Air Quality Standards (NAAQS) and AQRV regarding the protection of any affected Federal Class I Areas designated under the Clean Air Act. Any significant concentrations of hazardous air pollutants should be evaluated to ensure public health protection.

4. *Effects on wildlife habitat and vegetation*

Wind energy generation projects potentially may disrupt important wildlife species habitat. During construction of the proposed project, vegetation would be cleared and soils moved during road building activities, the establishment of wind turbine foundations, and construction of substation(s) and other associated facilities. The effects of project activities on area ecology, including vegetation, wildlife and their habitats, should be disclosed and evaluated in the EIS. The EIS should describe the current quality and capacity of habitat and its use by wildlife in the proposed project area. The EIS should include a description of any critical habitat for the species, identify any impacts the proposed project will have on the species and their critical habitats, and describe how the proposed project will meet all requirements under the Endangered Species Act (ESA). Continuous, uninterrupted habitat is particularly important to prairie ecosystems. The EIS should evaluate for fragmentation impacts on individual prairie species related to placement of a large number of turbines, support structures, right of ways, and

new roads. A proposed mitigation plan with detailed mitigation steps to minimize or eliminate adverse impacts should be presented.

The EIS should include maps that identify locations of important migration corridors of birds in the project area, and identify potential avian collision hazard areas. Avian flyways and migration corridors should be avoided, as well as areas where birds are highly concentrated. Having a thorough understanding of bird flight patterns in and around the project area will be beneficial in determining a turbine layout that will be effective in reducing the likelihood of migratory bird mortalities. The configuration of turbines should be explored to reduce the risk of avian mortality. Sources of avian mortality at wind farm facilities include guy wires, transmission lines and electrocution from power lines. The EIS should evaluate potential effects on birds, including bird mortality and changed migratory patterns, and identify mitigation to avoid adverse effects to birds.

The relatively high rate of bat fatalities related to wind energy projects is an increasing concern. Bat migration corridors should also be identified and mapped in the EIS, and these areas should be avoided. Locations where there are known bat hibernating, breeding, and maternity/nursery colonies should also be avoided when placing turbines. Barotrauma has been identified in numerous studies as a cause for high bat mortality rates. The potential impacts to bats and mitigation plans for offsetting these should be addressed in the EIS.

If any pesticides and herbicides will be used for pest control or vegetation treatment during the proposed project operations, the EIS should disclose any potential toxic hazards related to the application of the chemicals, and describe what actions will be taken to assure that impacts by toxic substances released to the environment will be minimized. If vegetation burning is proposed, then the EIS should include a smoke management program that would be followed to reduce public health impacts and potential ambient air quality exceedances. A noxious weeds management plan should also be considered to reduce the risk of the dispersion of invasive species.

EPA supports project strategies that include a monitoring program that can identify problems as they occur so that corrective actions or additional mitigation can be implemented. A monitoring program could be designed to include an effective feedback element, including implementation and effectiveness monitoring. Consider developing a monitoring plan for terrestrial and aquatic habitats prior to disruption in order to establish a valid baseline database from which to measure and detect future impacts. It may be helpful if the monitoring plan utilizes available information from state environmental and conservation agencies, and nonprofit conservation organizations to help establish baseline conditions prior to project development. This information could be helpful to monitor bird and bat mortality rates as well as infestation of noxious weeds.

5. *Road and construction issues*

The EIS should evaluate effects of any proposed road improvements, new road construction, and general right of way construction and operation activities on the area. The

evaluation should include increased access, travel management and enforcement aspects, as well as impact to the flora and fauna of the area. Dust particulates from construction, and ongoing operations on roadways are important concerns. Airborne dust may not only be a visual nuisance, but can be potentially dangerous to asthma sufferers. Sedimentation run-off can severely impact the aquatic environment. Construction techniques such as 95% base compaction prior to placement of gravel, culverts for water drainage, steep slope construction measures to prevent erosion, and appropriate dust control methods (such as placement of a non-chlorine based dust abatement chemical treatment), are important dust suppression and sediment reduction techniques. Detailed plans for addressing dust control for the project should be included. The plans should include, though are not limited to dust suppression methods, inspection schedules, and documentation and accountability processes.

6. *Cumulative impacts*

The EIS should examine the cumulative impacts of development. In determining whether a project may have a significant effect on the human environment, it should analyze direct and indirect effects, including past, present and reasonably foreseeable future activities. The impacts should be analyzed according to airsheds and watersheds for example, rather than political boundaries. The assessment should include the cumulative impact of energy-related activities, agriculture and other reasonably foreseeable energy development projects, and any other activities within the project area that may affect air and water quality.

7. *Environmental Justice*

The proposed wind power integration project should include potential impacts on low income, minority, and/or Tribal communities. The project evaluation should consider how to meet environmental justice requirements consistent with Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applicable to federal agencies that conduct activities that substantially affect human health or the environment. In accordance with this order, the EIS should disclose and evaluate environmental justice issues associated with impacts on rural low-income communities by the proposed actions for the reasonably foreseeable development analysis.

8. *Greenhouse gases and climate change*

Global climate change has become an increasingly important issue of concern to address in NEPA documentation. The Supreme Court Opinion in *Massachusetts, et. al. v. EPA*, issued April 2, 2007, indicated that the Court considers it "reasonably foreseeable" that greenhouse gases (GHGs) produced by man's activities are contributing to climate change. EPA recently published an Advanced Notice of Proposed Rulemaking (July 11, 2008) to solicit public comment on climate change and the regulation of greenhouse gases under the Clean Air Act, (please refer to <http://www.epa.gov/climatechange/anpr.html>).

In the interim period as regulations are being developed, EPA recommends that for NEPA disclosure purposes the EIS estimate annual greenhouse gas emissions that is expected

during operations, and describe that in terms of CO₂ equivalents in metric tons per year and per megawatt hour produced. The EIS should compare these values to estimated greenhouse gas emissions on a regional or statewide scale. For example, comparing the magnitude of annual emissions from other sources in South Dakota such as coal-fired powerplants will enable the decision makers to better understand the level of greenhouse gases associated with the proposed project. The EIS should also discuss voluntary measures available to reduce and offset greenhouse gas emissions.

EPA appreciates the opportunity to provide detailed scoping comments at this early stage of the EIS process. In summary, EPA's primary concerns to consider for the proposed wind energy project are protection of water quality, wetlands and riparian areas and associated ecosystems, air quality, and impacts to wildlife. If we may provide further explanation of our comments during this phase of your planning process, please contact me at 303-312-6004, or Melanie Wasco of my staff at 303 312-6540.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Svoboda".

Larry Svoboda
Director, NEPA Program
Ecosystems Protection and Remediation



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- I prefer paper mailings.

Please Print Contact Info Below

<u>Name:</u> <i>Darold Thomas</i>	<u>Organization:</u> <i>land owner</i>
<u>E-mail address:</u>	<u>Daytime Phone No. (optional):</u>
<u>Street Address:</u>	<u>City / State / Zip Code:</u>

Please indicate any questions, comments or concerns you have about the Project in the comment section below (continue on separate sheet if necessary).

I attended the project scoping meeting in Plankinton, and studied the information on the Crow Lake Project. I am thoroughly convinced it is a great deal for everyone concerned, and hope the Crow Lake Project will be approved.

Darold Thomas

Thank you for your time and interest in the South Dakota PrairieWinds Project.



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- I prefer paper mailings.

Please Print Contact Info Below

<u>Name:</u> VERNON C VANDERHULE	<u>Organization:</u> n/a
<u>E-mail address:</u>	<u>Daytime Phone No. (optional):</u>
<u>Street Address:</u>	<u>City/ State / Zip Code:</u>

Please indicate any questions, comments or concerns you have about the Project in the comment section below (continue on separate sheet if necessary).

While I support wind energy projects, my concern is the mitigation of the aeronautical hazard created by these towers.

I prefer paper mailings.

I am aware that FAA Advisory Circular 70/7460-1 K Change 2 permits these towers to be built without every tower being lighted at night. However, this only results in a minimal mitigation of the aviation hazard. An aircraft making a forced landing at night has little ability to extend its landing location and it is foolish to suggest that such an aircraft could simply avoid the field entirely. The Pilot may have no options other than to come down within the field. Under these circumstances, unlighted towers constitute an unacceptable hazard, especially so when greater mitigation is possible.

This hazard can maximize the mitigation of the aeronautical hazard only by lighting each and every tower in the field.

Thank you for your time and interest in the South Dakota PrairieWinds Project.

From: sdprairiewinds
To: sdmail-0005
Date: 4/20/2009 7:03 AM
Subject: Re: Question regarding public hearing in Plankinton

Dear Ms. VanGenderen,

Thank you for your interest in the South Dakota PrairieWinds Project. We have submitted ads to several papers in the area. I have contacted our public relations individuals to see if we have submitted anything to your newspaper. Thank you for informing us of your newspaper.

Best regards,
Liana

Liana Reilly
NEPA Project Manager

>>> sdmail-0005 <sdmail@siouxvalley.net> 4/16/2009 10:14 AM >>>
Hello from the South Dakota Mail Newspaper in Plankinton:

After visiting with city and county officials, we were made aware of an upcoming important public hearing regarding the Prairie Winds project in Aurora County. We were given a copy of an invitation stating there will be a meeting on Wed. April 29th in Plankinton.

As the official legal newspaper for Plankinton and Aurora County, were you planning on submitting this hearing notice to our newspaper? The importance of such a project will affect the entire county.

Our publication deadline is Monday, April 20th.

If you have any questions, please call.

Thank you for your input.

Gayle A. Van Genderen
Publisher of the SD Mail Newspaper
(605) 942-7770

From: sdprairiewinds
To: Randy Wilkerson; Shauna Laber
CC: Dave Swanson; Jessica Wilton; Kevin Solie; mcresto@tierra-ec.com
Date: 4/20/2009 7:01 AM
Subject: Fwd: Question regarding public hearing in Plankinton
Attachments: Question regarding public hearing in Plankinton

Hello-

Just wondering if we contacted this paper yet. They submitted a comment to our email address.

Thank you!
Liana

Subject: FW: Map question from SD Mail Newspaper
Attachments: Crow_Lake.jpg

-----Original Message-----

From: Shauna Laber
Sent: Tuesday, May 05, 2009 8:36 AM
To: 'sdmail@siouxvalley.net'
Cc: Kevin Solie; Erin Dukart; Ron Rebenitsch
Subject: Re: Map question from SD Mail Newspaper

Please find the attached image that you requested. Let me know if you need anything else.
Sincerely,
Shauna Laber

----- Original Message -----

From: Shauna Laber
To: sdmail-0005 <sdmail@siouxvalley.net>
Cc: Kevin Solie; Erin Dukart; Ron Rebenitsch
Sent: Fri May 01 11:39:00 2009
Subject: RE: Map question from SD Mail Newspaper

Hello! I have requested the jpg from engineering and they will forward it to me early next week. This is the earliest that I can get it forwarded to you. Regarding your follow up question, the following is our understanding of the timing, which the federal agencies control and their contact information is on the scoping materials in which you picked up on Wednesday. The approximate timeline should be:

- Basin intends to begin construction in 6/10 or 7/10
- Accordingly all approvals would have to precede this date.
- Western Power Admin will publish a Public Scoping Report, and this should be out in a month or two
- Preliminary draft Environmental Impact Statement should be available this fall (Oct(ish)/09 date you cited below), which will give an indication of which site may be likely selected
- In the Fall of '09 Basin will submit our PUC application
- There will be a public comment period in 04/10 or 05/10 as per the Federal NEPA process slide
- Construction may not begin until a Record of Decision for the Environmental Impact Statement has been issued by Western, and this is the end of the Federal process. We would like this to be complete by 06/10.

Should you have further questions please feel free to contact us or the appropriate Federal agents that were also in attendance.

Sincerely,

Shauna Laber

SHAUNA LABER
COMMUNITY REPRESENTATIVE - Impact Alleviation & Housing External Relations & Communications
Department Basin Electric Power Cooperative Direct Line: 701-557-5719 Cell Phone: 701-390-3601

-----Original Message-----

From: sdmail-0005 [mailto:sdmail@siouxvalley.net]
Sent: Friday, May 01, 2009 10:09 AM
To: Shauna Laber
Subject: Map question from SD Mail Newspaper

Hello Shauna:

It was very nice meeting you and the other Basin Electric staff at the scoping meeting on Wednesday.

As I had questioned, may I please have a jpg of the Aurora/Brule/ Jerauld map for the Crow Creek project?

Thank you so very much,

Gayle Van Genderen

SD Mail Newspaper

Plankinton, SD

(605) 942-7770

P.S. There has been some local debate over the time line for the WAPA federal statement release, Is it October of 2009 or October of 2010?

Thanks, again



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Please Print Contact Info Below

<u>Name:</u> <i>Denise Vanden...</i>	<u>Organization:</u>
<u>E-mail address:</u>	<u>Daytime Phone No. (optional):</u>
<u>Street Address:</u>	<u>City / State / Zip Code:</u>

Please indicate any questions, comments or concerns you have about the Project in the comment section below (continue on separate sheet if necessary).

Thank you for your time and interest in the South Dakota PrairieWinds Project.



DEPARTMENT OF GAME, FISH, AND PARKS

Foss Building
523 East Capitol
Pierre, South Dakota 57501-3182

May 12, 2009

Ms. Liana Reilly
Document Manager
Western Power Administration
Cooperate Services Office – A7400
P.O. Box 281213
Lakewood, CO 80228-8213

Dear Ms. Reilly,

This is in response to your letter dated April 9, 2009 regarding notice of Prairie Winds SD1 wind power project, its associated Environmental Impact Statement (EIS), and invitations to participate in an interagency meeting, and to serve as a cooperating agency in the development in the EIS. The location of this project would either be near Wessington Springs or Winner, South Dakota.

We recognize and appreciate your efforts in keeping our Department informed on the development of this proposed project. As you may be aware, our Department has provided information and comments on both of the proposed sites/potential wind power projects. Correspondence has been exchanged between various staff in our Department either with Basin Electric, Terracon Consultants, Inc., or Western Area Power Administration via letters, emails, and phone calls regarding Natural Heritage Program data, information on private lands enrolled in conservation programs, environmental review comments, and suggestions to improved proposed pre-construction wildlife survey protocol.

In brief, the State of South Dakota supports the responsible development of alternative sources of energy and appreciates the consideration of direct and indirect impacts of wind power development on wildlife. These impacts include mortality from turbine strikes, habitat alteration, and behavior modification from improperly sited wind power projects.

Potential impacts to the following should be addressed in the EIS:

- High quality and/or contiguous grassland habitats
- Areas with high concentrations of wetlands

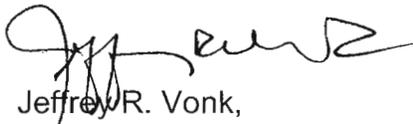
- Wildlife species including the American Burying beetle, Whooping Crane, Trumpeter Swan, area-sensitive grassland bird species, and migratory tree-roosting bats

The cumulative affects of existing wind power projects, the proposed wind power project and potential future development and associated infrastructure (transmission lines, roads, etc.) also should be addressed.

Please refer to the letters from our Department dated December 14, 2007 to James Berg of Basin Electric Power Cooperative and December 30, 2008 to Kim Austin of Terracon Consultants, Inc. for more detailed information including issues that our Department considers important and ways to address potential impacts. These letters and the associated Natural Heritage Program data also provide the information on unique and/or special resources or areas in the proposed project areas.

Please keep our Department informed of project developments and on your contact list during the NEPA process. Please provide this information to Tom Kirschenmann, Chief of Terrestrial Resources at 523 East Capitol, Pierre, SD, 57501.

Sincerely,



Jeffrey R. Vonk,
Department Secretary

Enclosures (2)

cc: Tony Leif, Division of Wildlife Director
Tom Kirschenmann, Chief of Terrestrial Resources, DOW
Silka Kempema, Wildlife Biologist, DOW



DEPARTMENT OF GAME, FISH AND PARKS

Foss Building
523 East Capitol
Pierre, South Dakota 57501-3182

December 30, 2008

Kim R. Austin
Terracon Consultants, Inc.
1815 South Eisenhower
Wichita, KS 67209

RE: South Dakota Department of Game, Fish and Parks (SDGFP) environmental review of Prairie Winds Project in Tripp County, South Dakota

Dear Ms. Austin,

This letter is in response for your request for review of a proposed wind farm located on 75,000 acres in Tripp County. Please let us know if you have additional details regarding associated infrastructure, nameplate capacity or if major changes are made to the proposed project.

The proposed siting and operation of a wind power project has potential to directly and indirectly impact area wildlife. This may occur by altering important and declining habitats and influencing both breeding and movement behavior of wildlife and/or by killing bats and birds through wind turbine and power line strikes. While we applaud efforts to provide renewable energy sources, we offer the following information on wildlife habitats and associated species that contribute to South Dakota's natural heritage and that may be impacted by wind energy development. If major direct and indirect impacts are predicted, we recommend avoidance. If minor impacts are unavoidable, we recommend mitigation to lessen these impacts. We also provide additional contacts and resources for further information.

Doug Backlund, our Natural Heritage Program Database (NHPD) manager, will be providing you location information for species at risk and/or those that are rare and known to be within the Proposed Project Area. Species at risk are those that are threatened or endangered (legally protected) or rare. Rare species are those that are declining and restricted to limited habitat, peripheral to a jurisdiction, isolated or disjunct due to geographic or climatic factors or that are classified as such due to lack of survey data. Please note that absence of a species from the NHPD does not preclude its

presence in the Proposed Project Area. Many places in South Dakota have not been surveyed for rare or protected species. If you have questions regarding the NHPD search, please contact Doug Backlund at (605) 773-4345 or Doug.Backlund@state.sd.us.

HABITAT

Ecoregions (Bryce et al. 1998) - The Proposed Project Area is located primarily within two ecoregions: 1) Keya Paha Tablelands 2) Ponca Plains. The northern extension of the Proposed Project Area lies within the Subhumid Pierre Shale Plains. Ecoregions are areas that are similar in the type, quality, and quantity of environmental resources (e.g. geology, physiography, vegetation, climate, soils, land use, wildlife, and hydrology).

The Keya Paha Tablelands are found in the western half of the Proposed Project Area. This ecoregion is made of sandy, level to rolling plains. Annual precipitation is 16-20". Potential natural vegetation includes blue and sideoats grama, western wheatgrass, little bluestem, and needleandthread. Landuse is predominately cattle ranching interspersed with some cropland (dryland and irrigated). The Ponca Plains are found in the eastern portion of the Proposed Project Area. These level to gently rolling plains are unglaciated. This ecoregion is more mesic than the Keya Paha Tablelands (20-22" annual precipitation). Little bluestem, prairie sandreed, green needlegrass and needleandthread are potential natural vegetation grass species. Intensive row crop agriculture is located in some portions of this ecoregion. Cattle are grazed on certain soils.

Grasslands - The Proposed Project Area is located within the mixed-grass prairie zone. Native prairie within this zone is decreasing at an alarming rate. Seventy percent of the native mixed-grass prairie has been lost in South Dakota (Samson et al. 1998). Areas of untilled prairie have high conservation value for wildlife, especially those that contain a high diversity of both plant and animal species with invasive species being rare or absent. Based upon soil-type, areas of untilled native prairie most likely remain in the Proposed Project Area. Every effort should be made to avoid placement of turbines in high quality native prairie.

Other grassland types are found in the Proposed Project Area. These include rangeland, pasture, hayland, or idle grassland. Rangeland supports native vegetation suitable for grazing or browsing. It includes areas where native vegetation has been reestablished. The vegetation is mainly grasses, grasslike plants, forbs, or shrubs. The amounts and kinds of native vegetation in any one area are determined by the soil, topography, climate, past use, and management. Pasture and hayland are used for the production of adapted domesticated perennial forage plants that are grazed or hayed. These forage plants may be either native or introduced species and may be seeded alone or in mixtures. An example of idle grasslands is Conservation Reserve Program land (highly-erodible, tilled land taken out of crop production). These agricultural and idle grassland types serve as important habitat for grassland wildlife (Haufler 2005).

One of the major threats to grassland dependent wildlife is habitat degradation and destruction. This degradation can result from fragmentation (unnatural woody encroachment and plantings in inappropriate places, road construction, etc.). Some grassland wildlife species depend on large patches of habitat. These smaller disjunct patches often provide less suitable habitat for many native species of grassland wildlife. Due to the nature of the sandy soils and the large amount of rangeland in the area, much of the Proposed Project Area (excluding the northern extension and the extreme eastern edge) presumably contains large contiguous tracts of grassland. Efforts should be made to avoid activities that may fragment contiguous grassland tracts.

Wetlands (Rieger et al. 2006) – Natural wetland basins of various depths and sizes occur throughout South Dakota. In western South Dakota, a small proportion of the land area is comprised of wetlands. In this drier western region, these wetlands are particularly important and especially so in times of drought. Tripp County contains the greatest number of wetland basins (12.1%) of all western South Dakota basins. Tripp County also has the fifth largest wetland basin area in western South Dakota. In addition, this county has the highest wetland basin density (50 basins/10km²) of the 22 western South Dakota counties. Placement of turbines should avoid areas with concentrations of wetlands.

WILDLIFE

Grassland birds - Grassland birds have shown the most consistent and long term declines of any other group of bird species in North America (Peterjohn and Sauer 1999). Placement of a wind farm in the Proposed Project Area may reduce habitat suitability for grassland birds (increase habitat fragmentation and invasive species) and modify behavior (e.g. avoidance). Some grassland bird species have been shown to favor large grassland patches (Johnson 2001, Johnson and Igl 2001, Svedarsky et al. 2003). Species that may occur in or near the Proposed Project Area and that have indicated area sensitivity include northern harrier, upland sandpiper, grasshopper sparrow, and bobolink.

Two grassland bird species of interest to SDGFP that may be found in the Proposed Project Area include the sharp-tailed grouse and greater prairie chicken. Note that the greater prairie chicken is a Species of Greatest Conservation Need as identified in our State Wildlife Action Plan (http://www.sdgifp.info/Wildlife/Diversity/Comp_Plan.htm).

The primary range of the sharp-tailed grouse in South Dakota is west of the Missouri River. It is a common (more than 25 individuals would be seen in appropriate habitat by a single observer) permanent resident. Sharp-tailed grouse are known to occur in Tripp County, near the Proposed Project Area. This species prefers grassland habitat (mid- to tall-grasses) with brushy draws and thickets. Courtship activity on communal display grounds (leks) occurs between late-March through April. Nesting also begins during this time. Leks are located on hilltops or other elevated sites with minimal vegetation. Nest sites are found within approximately 0.5 miles of the lek. Nests typically hatch

from last week in May through the first week in June. Deterioration of native grasslands, reduction of nesting and brood rearing cover, and variable climatic factors are limiting factors for this species.

The greater prairie-chicken is an uncommon (fewer than 25 individuals would be seen in appropriate habitat by a single observer) permanent resident in Tripp County. This species prefers fall- to mixed-grass prairies. Breeding behavior occurs on communal display grounds (leks) primarily between late-March through April. Nesting occurs in mid-May to June. Leks are located on barren areas or on areas with minimal cover. This species nests in grasslands (prairies, pastures, hayfields) located near (1-3 miles) lek site. Loss and fragmentation of tallgrass prairie considered reason for population declines.

These two species are known to be area-sensitive, requiring comparatively large tracts of open, contiguous grassland. The lesser prairie chicken, a similar species found more commonly in the southern Great Plains, avoids nesting within 400 m of transmission lines or improved roads (Pitman et al. 2005). This suggests that placement of turbines and associated infrastructure (roads and transmission lines) also may negatively affect greater prairie chickens.

We recommend that properly timed, species-appropriate surveys for breeding grassland birds be conducted before construction. Many privately-owned areas in South Dakota have not been surveyed for grassland songbirds or prairie grouse. Grassland songbird surveys are best conducted in June, although mid-May through early July is acceptable. Breeding ground (lek) surveys for prairie grouse species should be conducted in the spring (late March through April). Our agency respectfully requests a written summary of these surveys.

Waterfowl - The trumpeter swan is monitored by the Natural Heritage Program and these records show breeding pairs in or near the Proposed Project Area boundary. This species is a rare breeder in western South Dakota and records show migration through eastern South Dakota. An overwintering population of birds exists in the southcentral to southwestern portion of the state. These are most likely different individuals that those that breed here. This species inhabits shallow lakes and open marshes. Nesting occurs from mid-April through July. Five eggs are laid with an average of three young produced. Fledglings are present in South Dakota as late as August and September. Young birds can fly at 90-122 days after hatching. Adult pair bonds are maintained for life. Records of migration through eastern South Dakota are as early as April and banding recoveries show movement south in late-October and early-November. This species is sensitive to disturbance and pollution. Winter habitat availability and quality are a concern for this species. The trumpeter swan is the largest of the swans found in South Dakota. It can be differentiated from other swans by its size, yellow lores, and the visible kink at the base of the neck when the animal is at rest.

Waterbirds - This proposed project location is within the primary migration route of the 'Aransas National Wildlife Refuge to Wood Buffalo National Park' population of

whooping cranes. This species is protected as endangered under both state and federal laws. Placement of turbines in this area could very likely increase the chances of wind turbine and power line strikes and electrocutions. We are concerned about the direct impacts a potential wind power project may have on this population of whooping cranes. This species is state and federally protected. The federal Endangered Species Act is administered by the US Fish and Wildlife Service. As such, I recommend contacting the U.S. Fish and Wildlife (USFWS) Ecological Services Field Office in Pierre, SD for further information (605-224-8693 or southdakotafieldoffice@fws.gov). Also, please note that Virginia rails have been documented breeding on Little Dog Ear Lake Game Production Area.

Raptors - Improperly sighted wind farms are known to cause significant mortality to raptors. The Swainson's hawk is a raptor monitored by the NHP and has been documented breeding in the Proposed Project Area. Swainson's hawk is a common migrant in the state. In the north and west it is a common breeder; it is uncommon to rare in other portions of the state. This is a raptor of prairies and agricultural land with scattered trees. Spring migration occurs in the latter part of April with most birds returning south in mid-September. Nesting for this species takes place from late April to early August. This species may be easily disturbed during nesting.

In consideration of high soaring birds, especially raptors, placement of turbines in areas of elevation (e.g. ridges) should be avoided if raptor use is high. The Proposed Project Area should be surveyed for these high-raptor use areas.

Our records indicate no nesting bald eagles in the area. However, they may be nesting in the area without our knowledge. Migrant bald eagles also are possible in the spring and fall. Please know that the bald eagle is state protected as a threatened species. This species also is protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act which are both administered by the USFWS. As such, I recommend contacting the USFWS Ecological Services Field Office in Pierre.

Bats – Construction of a wind power project may interfere with daily and seasonal bat movements between breeding and foraging areas, including mortality of individual bats. There has been limited research conducted on bats in South Dakota. However, thirteen species of bats are currently known to be found in South Dakota, some of which are summer residents, year-round residents, or migratory (Table 1).

Table 1. South Dakota Bats

Common Name	Scientific Name	State Residency
Big Brown Bat	<i>Eptesicus fuscus</i>	Year-round resident
Fringed-tailed Myotis*	<i>Myotis thysanodes</i>	Year-round resident
Little Brown Myotis	<i>Myotis lucifugus</i>	Year-round resident
Long-eared Myotis*	<i>Myotis evotis</i>	Year-round resident
Long-legged Myotis	<i>Myotis volans</i>	Year-round resident
Northern Myotis*	<i>Myotis septentrionalis</i>	Year-round resident

Townsend's Big-eared Bat*	<i>Corynorhinus townsendii</i>	Year-round resident
Western Small-footed Myotis	<i>Myotis ciliolabrum</i>	Year-round resident
Hoary Bat	<i>Lasiurus cinereus</i>	Summer resident
Eastern Red Bat	<i>Lasiurus borealis</i>	Summer resident
Silver-haired Bat*	<i>Lasionycteris noctivagans</i>	Summer resident
Evening Bat*	<i>Nycticeius humeralis</i>	Migratory
Eastern pipistrell	<i>Pipistrellus subflavus</i>	unclassified

* = monitored by the Natural Heritage Program

Six bat species have a probable current distribution in Tripp County: 1) Northern myotis, 2) Western small-footed myotis, 3) little brown myotis, 4) silver-haired bat, 5) big brown bat, 6) eastern red bat, 7) hoary bat (Higgins et al 2000). The silver-haired bat, one of South Dakota's tree-roosting and migratory bats, is rare and monitored by the NHP (Table 1). Silver-haired bats have a probable distribution throughout the state of South Dakota. They require trees for roosting and maternity sites. In eastern South Dakota, they are found roosting in wooded areas along water courses. In treeless areas, they use fence post piles, boards, and bricks for roosts. Foraging areas include corridors found along roads and waterways. In the Black Hills, most silver-haired bats are captured during the summer (June to September). Mating takes place during late summer and two pups are usually born in June. Structural diversity in roosting habitats is required for this species. Because of limited, project-specific data we suggest pre-construction surveys of the area for potential bat habitat and species. Surveys for species should be conducted for at least one full year before construction. Please provide a written summary of these surveys to our agency.

South Dakota Department of Game, Fish and Parks in cooperation with the South Dakota Bat Working Group (SDBWG), developed the *South Dakota Bat Management Plan* specific to bats and their habitats in South Dakota (<http://www.sdgame.com/Wildlife/Diversity/batmanagementplan71304.pdf>). Please review this document for additional pertinent information.

Migrating Wildlife - Both bats and birds are known to be susceptible to direct strikes with wind turbines. Bat species that migrate long distances, such as migratory tree-roosting species, are commonly found killed by wind farms in the United States (Kunz et al. 2007). Red, hoary and silver-haired bats are migratory tree-roosting species. However, other species also are susceptible to direct strikes (i.e. big brown bat; Higgins et al. 2007). The earliest spring migration record for silver-haired bats in South Dakota is late-April in Brookings County. Fall migration for this species begins in late-August to early-September. It is hypothesized that red bats migrate into the state in April and leave in August and September. Specific timing of hoary bat migration in South Dakota is not known.

At currently levels of wind energy development in the United States, it is estimated that avian mortality associated with wind turbines is less than 1% of all avian collision fatalities (Erickson et al. 2001). Even this mortality can be reduced by siting wind power

projects in areas that have low bird use. The Central Flyway, an important pathway for migratory ducks, geese, swans, and cranes runs through the midsection of the country, including South Dakota. Species using this flyway during migration, and particularly during inclement weather when birds alter their flight altitude, may suffer increased mortality due to direct strikes with wind turbines and associated power lines. Rivers are often used to guide in migration. The Missouri River also is located within this Flyway. Spring migration can begin as early as late-March and tapering off in mid-May, depending on the species. Fall migration can begin as early as mid-July and extend through October/November depending on weather conditions and species.

Placement of turbines should be in areas away from daily and seasonal migration routes (i.e. to and from feeding or roosting areas and to and from breeding or wintering grounds) of both birds and bats. If this proposed project is constructed, we recommend conducting post-construction mortality searches for both bats and birds for two years post-construction to evaluate siting decisions. These searches should estimate searcher efficiency and incorporate scavenging trials. A written report of these surveys should be provided to our agency.

Invertebrates - The American burying beetle has been extirpated from approximately 90% of its former range. This species is known to remain in seven states, including South Dakota. Within the state, the range of the American burying beetle is restricted to areas relatively undisturbed by human influence and commonly with sandy soils. This species is found in southern Trip County and portions of Todd and Gregory Counties. It is found within the Proposed Project Area boundary.

The American burying beetle is a large (25-45 mm or 1-1.5"), black and orange, carrion-eating beetle. It is nocturnally active requiring night time air temperatures at a minimum of 60°F. This species can be distinguished from similar beetles by its orange-red pronotum and frons. This beetle uses carcasses that weight 100-250 grams (0.2-0.6 lbs). These carcasses are located using chemoreceptors. Carcasses are buried and preserved with bodily secretions. A brood chamber is built adjacent to the carcass and approximately 10-30 eggs are laid in June and July. Adults care for the resulting larvae by feeding them carrion. Teneral beetles emerge in July and August. After an underground, overwintering period, these young, soft beetles become the entire adult population the following year. Only one brood is raised/year. Adults die after the breeding season, living only for approximately one year. Adult beetles can fly moderate distances. Reasons for decline are complex and not well understood but include habitat fragmentation and isolation, reduction in availability of preferred carrion sizes, human activity, pesticides, and behavior modification from artificial night lighting. This species is federally protected. Please contact the USFWS Ecological Services Field Office in Pierre, SD. More information on the population found in South Dakota can be found at <http://www.sdgfp.info/wildlife/diversity/ABB/ABB.htm>.

OTHER

Landscape considerations - Placement of a wind power project should take into account larger landscape-level (e.g. surrounding land uses) and cumulative impacts (e.g. existing and potential wind power projects) as well as project associated infrastructure (i.e. transmission lines and roads).

Public lands - Placement of public lands is often done so in areas with existing and potential wildlife habitat. Management of these lands, for wildlife, is conducted in the public interest. Wildlife that use these areas may be affected by the placement of a wind power project in the area. There are three tracts of public lands that exist near or just within the Proposed Project Area boundary: 1) Dog Ear Lake, 2) Little Dog Ear Lake, and 3) and Roosevelt Dam. The location of these and other public lands can be found on line at <http://www.sdgfp.info/Wildlife/PublicLands/PubLand.htm>. All three of these Game Production Areas have records of species monitored by the NHP.

Powerlines – New power lines are often associated with a proposed wind power project. Power line strikes are a known cause of mortality to birds (Erickson et al. 2005). Waterfowl (ducks, geese, swans, and cranes), raptors, and passerines are species most susceptible to powerline collisions. The Avian Protection Power line Interaction Committee has developed two documents that may be of use to reduce powerline strikes and mortality: 1) *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* and 2) *Mitigating Bird Collisions with Power Lines*. Both of these documents are available from the Edison Institute (<http://www.aplic.org/>, under 'products and services'). New and existing power lines associated with the proposed project should be buried if at all possible, marked, or retrofitted to reduce strikes and electrocutions of bird species.

Non-native/invasive plant species - During the construction and maintenance phase of a wind power project existing roads often experience increased traffic and new roads are constructed. This increases the amount of area disturbed and increases opportunity for the introduction and establishment of non-native plant species. Resulting control of those species through pesticides and herbicides may also impact habitats of rare wildlife species. Invasive, non-native plant species are one of the major threats to threatened and endangered wildlife species. Improved access can also increase human disturbance to wildlife in the area. Any disturbance to native vegetation should be kept to a minimum. Disturbed areas should be revegetated using native seed sources. The Natural Resource Conservation Service Plant Materials Center in Bismarck, ND may serve as a good source of information on native plantings (<http://plant-materials.nrcs.usda.gov/ndpmc/>). Additional information on where to get these seed sources and how and why to establish them can be found at the following links:

- Five Reasons to Choose Native Grasses
 - <http://www.plant-materials.nrcs.usda.gov/pubs/ndpmctn7875.pdf>
- Five Myths Concerning Native Grass Varieties

- <http://www.plant-materials.nrcs.usda.gov/pubs/ndpmcsy5406.pdf>
- Origins of Native Grass and Forb Releases
 - <http://www.plant-materials.nrcs.usda.gov/pubs/ndpmctn6786.pdf>
- Conservation Seed/Plant Vendors List
 - <http://plant-materials.nrcs.usda.gov/NDPMC/pubs/ndpmcot8-CSPVendor.pdf>
- Prairie Landscaping Seed/Plant Vendors List
 - <http://plant-materials.nrcs.usda.gov/NDPMC/pubs/ndpmcot8-PLVendor.pdf>

Research and monitoring - Northern Prairie Wildlife Research Center, a part of the US Geological Survey, is currently investigating the influence of wind generators on breeding grassland bird density and species composition in the Dakotas. The results of this study may be of interest as you work on the siting and development of this proposed project. Please contact Jill Shaffer (701-253-5547 or jshaffer@usgs.gov) for more information.

Please note that if survey and monitoring activities includes live trapping or collection of wildlife species, you must first obtain a collection permit from our agency. If these activities include bats, specific sampling and collection protocols must be followed for a collectors permit to be issued. More information can be found by contacting Doug Backlund or at the following websites:

- Scientific Collectors Permit
 - http://www.sdgifp.info/Wildlife/Diversity/free_scientific_collector.htm
- Bat Sampling and Collection Protocol Guidelines and Requirements
 - <http://www.sdgifp.info/Wildlife/Diversity/batprotocol.pdf>

If during your monitoring activities you or your associates observe any of the animal or plant species monitored by the NHP, we request that reports of these observations be provided to the NHP. A list of monitored species can be found at <http://www.sdgifp.info/Wildlife/Diversity/>.

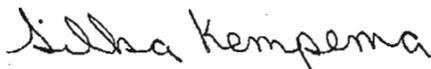
Siting - In coordination with the SDBWG, the SDGFP has developed *Siting Guidelines for Wind Power Projects in South Dakota*. This document addresses many of the concerns involved with siting wind power projects in South Dakota and may be found on the web (<http://www.sdgifp.info/Wildlife/Diversity/windpower.htm>). These voluntary guidelines are currently being updated using a multi-stakeholder, consensus-based approach. A new set of guidelines is scheduled to be available in the spring of 2009.

Summary - As outlined above, our agency has concerns regarding direct and indirect impacts to wildlife and habitats in association with the siting of the proposed project. The Proposed Project Area contains quality habitats with a variety of wildlife species important to the natural heritage of South Dakota. Of particular concern are impacts to large native prairie areas, the American burying beetle, whooping crane, and trumpeter swan. Because of the potential impacts placement of the proposed wind power project would have on unique and declining habitats in the region and their associated species, we recommend the following:

- Avoid placement of turbines in high quality native prairie.
- Avoid activities that may fragment contiguous grassland tracts.
- Avoid placement of turbines in wetland areas, especially those with high concentrations of basins.
- Properly timed, species-appropriate surveys for breeding grassland birds should be conducted before construction.
- Avoid placement of turbines in areas with high use by raptors.
- Conduct pre-construction surveys for potential bat habitat and species.
- Place turbines away from daily and seasonal bird and bat migration routes.
- Conduct post-construction mortality searches for bats and birds (\geq two years).
- Power lines should be buried, marked, or retrofitted.

The SDGFP appreciates the opportunity to provide comments. If you have any questions on the above comments, please feel free to contact me at 605-773-2742 or Silka.Kempema@state.sd.us.

Regards,



Silka L. F. Kempema
Terrestrial Wildlife Biologist

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DEPARTMENT OF GAME, FISH AND PARKS

Foss Building
523 East Capitol
Pierre, South Dakota 57501-3182

December 14, 2007

James Berg
Water Quality/Waste Management Coordinator
Basin Electric Power Cooperative
1717 East Interstate Ave
Bismarck, ND 58503-0564

RE: Environmental review of two potential
wind power projects near the cities of
Reliance and Crow Lake, SD

Dear Mr. Berg:

The following comments are in response to your letter dated 16 November 2007 requesting environmental review of two potential wind power projects near the cities of Reliance and Crow Lake, SD. This letter addresses environmental concerns regarding sensitive wildlife species and habitats, and other state wildlife interests such as migratory birds, bats, grassland and wetland resources, and environmental properties.

Doug Backlund, our Natural Heritage Database (NHD) manager, has provided location information on rare and protected species known to be within the proposed project areas and included in our NHD. Please note that absence of a species from the NHD does not preclude its presence in either of the proposed project areas. Many areas in South Dakota have not been surveyed for native wildlife species. An invoice for the database search is enclosed. If you have further questions regarding the NHD search, please contact Doug Backlund at (605) 773-4345. If you have specific questions about the plant records, please contact our botanist, Dave Ode, at (605) 773-4227.

The proposed siting and operation of a wind power project has the potential to directly and indirectly impact area wildlife by killing bats and birds (wind turbine and power line strikes) and altering wildlife habitat (fragmentation, degradation, and conversion) and behavior (breeding and daily and seasonal movements). While we applaud efforts to provide alternative energy sources, we offer the following information on grassland and wetland habitats and associated species. We also provide additional suggestions on avoiding impacts to these wildlife resources. If impacts are unavoidable, we recommend mitigation to avoid or lessen direct and indirect impacts.

Ecoregions

The Reliance Proposed Project Area is located within the River Breaks and the Subhumid Pierre Shale Plains ecoregions (Bryce et al. 1998). The River Breaks ecoregion is characterized by steep and dissected topography especially along tributaries to the Missouri River. Topographical variation has precluded cultivation, much of the area remains as native rangeland. Also interspersed with wooded draws, this ecoregion is a haven for wildlife. The Plains ecoregion is characterized by rolling plains with occasional topographical relief from buttes and badlands. The land is cultivated in the lower lying areas to small grains and alfalfa; steep and broken areas are native rangelands. The region is susceptible to soil erosion.

The Crow Lake Proposed Project Area is located primarily within the Southern Missouri Coteau Slope (Bryce et al. 1998). The level to rolling uplands characteristic of this region are converted to agricultural crops (small grains and row crops). The simple stream drainages are often grazed.

Grasslands

Both of the proposed project areas are located within the mixed-grass prairie zone. Native grasslands within this zone are decreasing at an alarming rate. Seventy percent of the native mixed-grass prairie has been lost in South Dakota (Samson et al. 1998). Other grassland types such as native rangeland (grazed grasslands with native plant spp.), pasture (grazed grasslands with non-native plant spp.) and Conservation Reserve Program lands (formerly tilled lands planted to vegetative cover for erosion control and wildlife habitat) serve as wildlife habitat (Haufler 2005). Fragmentation resulting from woody encroachment, road construction, and conversion of surrounding habitat has resulted in remaining grassland types existing as smaller disjunct patches. These patches often provide less suitable habitat for many native species of grassland wildlife.

The Reliance Proposed Project Area contains large areas of contiguous grasslands, especially in the northern and western portions. Although the Southern Missouri Coteau Slope ecoregion is described as extensively cultivated, the Crow Lake Proposed Project Area is primarily native prairie and contiguous grassland habitat still exist within the center of this project area. Efforts should be made to avoid activities in contiguous grassland areas that may fragment these habitat types.

Grassland birds

Specifically, placement of turbines in the proposed project areas may alter habitat and behavior of grassland birds. Grassland birds have shown the most consistent and long term declines of any other group of bird species in North America (Peterjohn and Sauer 1999). Several grassland bird species are known to be area sensitive (Johnson, 2001, Johnson and Igl 2001). Area-sensitive species known to occur in the Crow Lake proposed project area include Northern harrier, upland sandpiper, sedge wren, field sparrow, vesper sparrow, savannah sparrow, grasshopper sparrow, dickcissel, bobolink, and Western meadowlark. Similar grassland bird species may be expected to be found in the Reliance proposed projected area.

The proposed project areas are in the current geographic distribution of the greater prairie chicken. This species also is known to be area-sensitive, requiring comparatively large tracts of open, contiguous grassland. The lesser prairie chicken, a similar species found more commonly in the southern Great Plains, avoids nesting within 400 m of transmission lines or improved roads. This suggests that placement of turbines and associated infrastructure (roads and

transmission lines) also may negatively affect greater prairie chickens. A second prairie grouse species, the sharp-tailed grouse, also is a known breeder in both proposed project areas.

Properly timed, species-appropriate surveys for prairie grouse (greater prairie chickens and sharp-tailed grouse) and other grassland bird species should be conducted pre-construction. Breeding ground surveys for prairie grouse species should be conducted in the spring (late March through April). Surveys for other breeding grassland birds are best conducted in June, although mid-May through early July is acceptable.

Upland birds are known to be susceptible to direct strikes with wind turbines. Based on a study conducted in the Buffalo Ridge area of Minnesota (Higgins et al. 2007), upland bird species with known wind turbine strike mortality and known to occur in the Crow Lake proposed project area include the Bell's vireo, sedge wren, grasshopper sparrow, and western meadowlark. Burrowing owls have been documented to occur near the Crow Lake proposed project area. This species is most often found within black-tailed prairie dog colonies in South Dakota. This owl is also known to suffer from direct strikes with wind turbines in other areas of the country (Smallwood et al. 2007). Similar bird species may also be found in the Reliance Proposed Project Area.

Wetlands

The Crow Lake proposed project area is located within the Prairie Pothole region. This glaciated region, characterized by high densities of wetland basins of various depths and sizes, extends from Iowa into Minnesota, the Dakotas, Montana, and parts of Canada. It is the major waterfowl production area in North America. Wetland losses in the Prairie Pothole Region are staggering and range from 99% in Iowa to 35% in South Dakota. The number of wetland basin densities (# of basins/10 mi²) in the proposed project area is 90-100 basins/10 miles² (Johnson and Higgins 1997). This is some of the lower basins density levels in the Prairie Pothole region. Although wetland densities are comparatively lower than elsewhere in the in the Prairie Pothole Region, care must be taken to avoid impacts to the wetland resources in this glaciated region. Although the Reliance Proposed Project Area is not within the Prairie Pothole region, proper there are still numerous wetlands and lakes in the area. Micro-siting of turbines within the proposed project area should avoid placement of turbines in areas with conglomerations or wetlands and lakes.

Wetland birds

Waterbird species such as pied-billed, eared, and Western grebes, great egret, great blue heron, Franklin's gull, black tern, marbled godwit, and Wilson's phalarope are known to occur near the Crow Lake proposed project area. The black tern, marbled godwit and Wilson's phalarope are species of particular concern in South Dakota; they are recognized as Species of Greatest Conservation Need (South Dakota Department of Game, Fish and Parks 2006) and are priority level I species in the South Dakota All-Bird Conservation Plan (Bakker 2005).

Wetland birds also are susceptible to direct strikes with wind turbines. Based on a study conducted in the Buffalo Ridge area of Minnesota (Higgins et al 2007), species with known wind turbine strike mortality and are known to occur in the Crow Lake proposed project area include ruddy duck, American coot, and Franklin's gull. Similar species should be expected to occur at the Reliance site. Proper siting of turbines, outside of daily and seasonal movement and migration routes of waterbirds and waterfowl, and the protection of remaining wetlands within the proposed project area is crucial to reduce the impact to wetland dependent species.

Bats

Construction of a wind power plant may affect daily and seasonal bat movements between breeding, wintering/hibernation, and foraging areas. Thirteen species of bats are currently known to be found in South Dakota and are considered either summer or year-round residents or migratory (Table 1).

Table 1. South Dakota Bats

Common Name	Scientific Name	State Residency
Big Brown Bat	<i>Eptesicus fuscus</i>	Year-round resident
Fringed Myotis	<i>Myotis thysanodes</i>	Year-round resident
Little Brown Myotis	<i>Myotis lucifugus</i>	Year-round resident
Long-eared Myotis	<i>Myotis evotis</i>	Year-round resident
Long-legged Myotis	<i>Myotis volans</i>	Year-round resident
Northern Myotis	<i>Myotis septentrionalis</i>	Year-round resident
Townsend's Big-eared Bat	<i>Corynorhinus townsendii</i>	Year-round resident
Western Small-footed Myotis	<i>Myotis ciliolabrum</i>	Year-round resident
Hoary Bat	<i>Lasiurus cinereus</i>	Summer resident
Red Bat	<i>Lasiurus borealis</i>	Summer resident
Silver-haired Bat	<i>Lasionycteris noctivagans</i>	Summer resident
Evening Bat	<i>Nycticeius humeralis</i>	Migratory
Eastern pipistrell	<i>Pipistrellus subflavus</i>	unclassified

There has been limited research conducted on bats in South Dakota. However, Swier (2006) and Bales (2007) reported six species of bats occurring near the proposed project areas: 1) big brown bat, 2) silver-haired bat 3) hoary bat, 4) red bat, 5) little brown myotis, and 6) Northern myotis.

Of these six species, the silver-haired bat and Northern myotis are considered rare and monitored by the Natural Heritage Program (NHP). Silver-haired bats have a probable distribution throughout the state of South Dakota. They are classified as a tree bat requiring trees for roosting and maternity sites. In eastern South Dakota, they are found roosting in wooded areas along water courses. In treeless areas, they use fence post piles, boards, and bricks for roosts. Foraging areas include corridors found along roads and waterways. The earliest spring migration record for this species is late-April in Brookings County. Fall migration begins in late-August to early-September. In the Black Hills, most silver-haired bats are captured during the summer (June to September). Mating takes place during late summer and two pups are usually born in June. Structural tree-age diversity in roosting habitats is required for this species.

The Northern myotis has a probable distribution throughout the state. In central and eastern South Dakota it is found most often in riparian forest along rivers and streams. Summer roosts in this part of the state are found in trees (cavities or under loose bark) or buildings. Caves, quarries, and old mines serve as winter hibernation sites. This species does not forage over water. Instead the Northern myotis often forages over forested hillsides and ridges, just under the forest canopy. Breeding occurs in autumn; one pup is born the following July. Threats to this species include lost of hibernation sites, nursery trees, and foraging habitat and

disturbance at hibernation and nursery sites (under loose tree bark or under house shingles).

Based on a study conducted in the Buffalo Ridge area of Minnesota (Higgins et al 2007) the big brown bat, silver-haired bat, hoary bat, and red bat species currently known to be within the proposed project area are also known to be directly killed due to strikes with wind turbines. Because of limited, project-specific data, we would suggest pre-construction surveys of the area for potential bat habitat and species. Surveys for species should be conducted for at least one full year before construction.

Recently, South Dakota Department of Game, Fish and Parks (SDGFP) in cooperation with the South Dakota Bat Working Group (SDBWG), developed the *South Dakota Bat Management Plan* specific to bats and their habitats in South Dakota (<http://www.sdgifp.info/Wildlife/Diversity/batmanagementplan71304.pdf>). Please review this document for pertinent information. Again, because bats reside and migrate through South Dakota, it is important to evaluate the propose project area for roosting, feeding, migration and/or stopover habitat and to survey these areas for bats.

Protected Species

Bald eagles are known to nest in the Reliance Proposed Project Area. Bald eagles are a state threatened species and are protected federally under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. In addition, migrant bald eagles are possible in the spring and fall. This proposed project location is within the primary migration route of the 'Aransas National Wildlife Refuge to Wood Buffalo National Park' population of whooping cranes. This species is protected as endangered under both state and federal laws. Placement of turbines in this area could very likely increase the chances of wind turbine and power line strikes and electrocutions. We are exceptionally concerned about the direct impacts a potential wind power project may have on this population of whooping cranes.

Crow Lake Proposed Project Area – No records of nesting bald eagle occur in this proposed project area. However, bald eagles do nest in Brule County and new nests are appearing in the state each year. Although no records of the endangered whooping crane occur in this proposed project area, several sightings have occurred in Brule and Aurora Counties.

New and existing power lines associated with the proposed project should be buried, marked, or retrofitted to reduce strikes and electrocutions of whooping cranes and other bird species. The Avian Protection Power line Interaction Committee (APLIC) has developed two documents that may be of use: 1) *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* and 2) *Mitigating Bird Collisions with Power lines*. Both of these documents are available from the Edison Institute (<http://www.aplic.org/>, under 'products and services').

Landscape considerations

Placement of a wind power project should take into account larger landscape-level (e.g. surrounding land uses) and cumulative impacts (e.g. existing and potential wind power projects) as well as project associated infrastructure (i.e. transmission lines and roads).

Public lands

Part of the Reliance Propose Project Area lies within the Lower Brulé Sioux Tribe Indian Reservation. I would recommend you contact Ben Janis, Director of Lower Brule Department of Wildlife, Fish, and Recreation (phone: 605-473-5666, fax: 605473-1120) for Tribal input

regarding this proposed wind power project.

Two SDGFP Game Production Areas (GPA) are located within and adjacent to the Crow Lake Proposed Project Area (Crow Lake GPA and Horseshoe Lake GPA, respectively). Placement of public lands is often done in areas with existing and potential wildlife habitat. Managing these lands for wildlife is conducted in the public interest. These lands may be affected by the placement of a wind power project in the vicinity. The Wildlife Division of SDGFP has an online database of public land locations within South Dakota. You can access this resource via the web at <http://www.sdgifp.info/Wildlife/PublicLands/PubLand.htm>.

Migrating wildlife

The resulting mosaic of grassland and wetland basins and linear wetland corridors makes these proposed project areas an important migration route for birds (e.g., neotropical migrants, shorebirds, and waterfowl). The Central Flyway, an important pathway for migratory ducks, geese, swans, and cranes runs through the midsection of the country, including South Dakota. Species using this flyway during migration, and particularly during inclement weather when birds alter their flight altitude, may suffer increased mortality due to direct strikes with wind turbines and associated power lines. Appropriately timed, pre-construction surveys for migratory bird species should be conducted. Spring migration can begin as early as late-March to early-April and tapering off in mid-May, depending on the species. Fall migration can begin as early as mid-July and extend through October/November depending on species and weather conditions.

Powerlines

Construction of powerlines is often associated with a proposed wind power project. Power line strikes are a known cause of mortality to birds (Erickson et al. 2005). Waterfowl (ducks, geese, swans), cranes, raptors, and passerines are species most susceptible to powerline collisions. Power line strikes are one of the greatest threats to the endangered whooping crane. The Avian Protection Power line Interaction Committee has developed two documents that may be of use to reduce powerline strikes and mortality: 1) *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* and 2) *Mitigating Bird Collisions with Power lines*. Both of these documents are available from the Edison Institute (<http://www.aplic.org/>, under 'products and services'). The new and existing power lines associated with the proposed project should be buried, marked, or retrofitted to reduce strikes and electrocutions of birds.

Non-native/invasive plant species

During the construction and maintenance phase of a wind power project new roads are constructed and existing roads often experience increased traffic. This increased amount of disturbance allows for the introduction and establishment of non-native/invasive plant species. Resulting control of those species through pesticides and herbicides may also impact habitats of rare wildlife species. Non-native plant species are one of the major threats to threatened and endangered wildlife species. Improved access (via roads) can also increase human disturbance to wildlife in the area.

Monitoring and Research

If monitoring plans involve live trapping or collection of wildlife species, you must first obtain a collection permit from our agency. Also, we kindly request that if you or your

associates observe any of the animal or plant species monitored by the NHP, please contact myself or any of our NHP staff (http://www.sdgifp.info/Wildlife/Diversity/staff_contact.htm). A list of species monitored by the NHP can be found at:
<http://www.sdgifp.info/Wildlife/Diversity/RareAnimal.htm> and
<http://www.sdgifp.info/Wildlife/Diversity/rareplant2002.htm>.

Northern Prairie Wildlife Research Center, a part of the US Geological Survey, is currently investigating the influence of wind generators on breeding grassland bird density and species composition in the Dakotas. The preliminary results of this study may be of interest to you. Please contact Jill Shaffer (701-253-5547 or jshaffer@usgs.gov) for more information.

Siting Guidelines

In coordination with the SDBWG, the SDGFP has developed *Siting Guidelines for Wind Power Projects in South Dakota*. This document addresses many of the general concerns involved with siting wind power projects in South Dakota and may be found at on the World Wide Web (<http://www.sdgifp.info/Wildlife/Diversity/windpower.htm>). I have enclosed a copy for your convenience.

Summary

As outlined above, our agency has concerns regarding direct and indirect impacts to wildlife and habitats in association with the siting of the proposed wind power projects. During the project planning state, appropriately timed and species appropriate wildlife surveys should be conducted for a minimum of one year, to determine bird and bat use of the project areas. Based upon results of these baseline surveys, project construction should be modified, continued, or cancelled. If the project is continued and because of the potential impacts placement of the proposed wind power project would have on wildlife and habitats in the region, we recommend the placement of turbines in areas currently disturbed (e.g. cultivated areas) and the use of existing infrastructure (roads and transmission lines) as much as possible. In addition, monitoring should be conducted for a minimum of two years post-construction to determine if and how many bird and bat strikes are caused by this project, if habitats have been significantly altered, and if wildlife habitats in the project area and surrounding areas have been impacted. Any mitigation should be carefully planned, funded, and followed.

The SDGFP appreciates the opportunity to provide comments on the proposed wind power projects. As a follow-up to this early screening and information gathering portion of your project planning, I would be willing to conduct a site visit with you or a representative of Basin Electric or Tetra Tech to further discuss these potential wind power projects. If you have any questions on the above comments, please feel free to contact me at 605-773-2742 or Silka.Kempema@state.sd.us.

Regards,



Silka L. F. Kempema
Terrestrial Wildlife Biologist

Enclosure: (3)

CC: Doug Backlund, SD Game, Fish and Parks, Pierre, SD
Jack Freidel, SD Game, Fish and Parks, Chamberlain, SD
Natalie Gates, US Fish and Wildlife Service, Pierre, SD
Andy Lindbloom, SD Game, Fish and Parks, Ft. Pierre, SD
Jill Shaffer, US Geological Survey, Jamestown, ND

References

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Element Occurrence Records for Reliance Project Area
South Dakota Natural Heritage Database
December 5, 2007

Scientific Name: *Asclepias lanuginosa*
Common Name: Woolly Milkweed
Global Rank: G4?
State Rank: S2
Township Range: 107N074W
Section: 08
"Shaley soil of upland prairie hillside."

Occurrence #: 3
Last Observed: 1967-06-23
State Status:
Federal Status:
County: Lyman

Scientific Name: *Grus americana*
Common Name: Whooping Crane
Global Rank: G1
State Rank: SNA
Township Range: 106N073W
Section: 36
2 ADULTS RESTING

Occurrence #: 93
Last Observed: 1996-04-12
State Status: SE
Federal Status: LE
County: Lyman

Scientific Name: *Grus americana*
Common Name: Whooping Crane
Global Rank: G1
State Rank: SNA
Township Range: 105N072W
Section: 08
1 Whooping Crane seen flying

Occurrence #: 121
Last Observed: 2003-11-01
State Status: SE
Federal Status: LE
County: Lyman

Scientific Name: *Haliaeetus leucocephalus*
Common Name: Bald Eagle
Global Rank: G5
State Rank: S1B,S2N
Township Range: 105N073W
Section: 1
NESTING PAIR, 2 FULLY FEATHERED BUT NOT QUITE FLEDGED
YOUNG ON JUNE 27, 2004-nest occupied with 2 fledged.

Occurrence #: 38
Last Observed: 2004-07-04
State Status: ST
Federal Status:
County: Lyman

Scientific Name: *Haliaeetus leucocephalus*
Common Name: Bald Eagle
Global Rank: G5
State Rank: S1B,S2N
Township Range: 106N072W
Section: 31
Female incubating, male nearby

Occurrence #: 59
Last Observed: 2004-04-08
State Status: ST
Federal Status:
County: Lyman

Element Occurrence Record for Crow Lake Project Area
South Dakota Natural Heritage Database
December 5, 2007

Scientific Name: *Chlidonias niger*
Common Name: Black Tern
Global Rank: G4
State Rank: S3B
Township Range: 106N066W
Section: 26

Occurrence #: 4
Last Observed: 1993-07-07
State Status:
Federal Status:
County: Jerauld

20+ CIRCLING AND CALLING OVER ISOLATED CATTAIL
STAND



DEPARTMENT OF GAME, FISH AND PARKS

Foss Building
523 East Capitol
Pierre, South Dakota 57501-3182

INVOICE

December 5, 2007

Fee for South Dakota Natural Heritage Database Search performed for:

James Berg
Basin Electric Power Cooperative
1717 East Interstate Avenue
Bismarck, North Dakota 58503-0564

1 hour of staff time @ \$30.00 per hour	\$30.00
<u>Two computer searches @ \$30.00 per search</u>	<u>\$60.00</u>
TOTAL	\$90.00

For review of the following projects:

Proposed Wind Energy Facilities near Reliance and Crow Lake.

Make check payable to **SD Dept. of Game, Fish and Parks**

Submit payment to:

South Dakota Dept. of Game Fish and Park
523 E. Capitol-Foss Bldg.
Pierre, SD 57501
ATTN: Doug Backlund



**South Dakota PrairieWinds Project
Environmental Impact Statement (EIS)**

Thank you for your interest in the proposed South Dakota PrairieWinds Project (Project). Please complete the appropriate sections of this form to be included on the Project mailing list and/or to provide comments. Written comments can be submitted at the Scoping Meeting, faxed to (720) 962-7263, mailed to the address on the back of this form or sent to the **Project Email Address: sdprairiewinds@wapa.gov**. Comments on the project scope and alternatives should be received by **May 15, 2009**, to be considered in defining the scope for the Draft EIS. For more information about the Project, please go to the **Project Website: <http://www.wapa.gov/sdprairiewinds.htm>**.

- I would like to be kept informed of the ongoing progress of this Project. Please include my name on the mailing list.
- I prefer electronic/email communication.
- I prefer paper mailings.

Please Print Contact Info Below

Name:

Luther & Avis Wilhelmson

Organization:

E-mail address:

Daytime Phone No. (optional):

Street Address:

City / State / Zip Code:

Please indicate any questions, comments or concerns you have about the Project in the comment section below (continue on separate sheet if necessary).

This is a project that should have been worked on a long time ago! Full speed ahead

Thank you for your time and interest in the South Dakota PrairieWinds Project.



**South Dakota PrairieWinds Project
Environmental Impact Statement (EIS)**

Thank you for your interest in the proposed South Dakota PrairieWinds Project (Project). Please complete the appropriate sections of this form to be included on the Project mailing list and/or to provide comments. Written comments can be submitted at the Scoping Meeting, faxed to (720) 962-7263, mailed to the address on the back of this form or sent to the **Project Email Address: sdprairiewinds@wapa.gov**. Comments on the project scope and alternatives should be received by **May 15, 2009**, to be considered in defining the scope for the Draft EIS. For more information about the Project, please go to the **Project Website: <http://www.wapa.gov/sdprairiewinds.htm>**.

- I would like to be kept informed of the ongoing progress of this Project. Please include my name on the mailing list.
- I prefer electronic/email communication.
- I prefer paper mailings.

Please Print Contact Info Below

Name:

Harold Winter

Organization:

E-mail address:

Daytime Phone No. (optional):

Street Address:

City / State / Zip Code:

Please indicate any questions, comments or concerns you have about the Project in the comment section below (continue on separate sheet if necessary).

*I am interested in transmission lines
to transmit voltage from
wind farms.*

Thank you for your time and interest in the South Dakota PrairieWinds Project.

From: sdprairiewinds
To: Kevin Solie; Yufna Soldier Wolf
Date: 5/1/2009 10:08 AM
Subject: RE: Northern Arapahoe Tribal Archaeological Consultants-monitors for areas of migration of the Northern Arapahoe Tribe.

Hear Yufna Soldier Wolf,

Thank you for your email, letter and phone call. I am forwarding this information to Basin Electric who is dealing with hiring contractors for the archeological work for the project.

Kevin-see below and attached for information from Yufna Soldier Wolf. Her phone number is 406 861 5796.

Best regards,
Liana Reilly

>>> Yufna Soldier Wolf <nativenunu@yahoo.com> 4/30/2009 3:24 PM >>>

Hello Liana Reilly,

I had seen your ad in the newspaper. I would just like to introduce you to our organization: Northern Arapahoe Tribal Consultants. We are enrolled tribal members of the Northern Arapahoe Tribe who understand the energy companies who look for natural resources. What we like to do is protect and mitigate some areas due to plants, animals, water, air, and most of all TCPs in the EIS stage. We do understand Sec.#106 and NAGPRA. This consultation is head up by my father Mark Soldier Wolf. Please read the letter attached.

Thank You and we look forward to hearing from you.

Northern Arapahoe Tribal Archaeological Consultants

Mark Soldier Wolf

P.O. Box 314

St. Stephens, WY 82524

(307) 857-2779 or Cell is (406) 861-5796

nativenunu@yahoo.com

Have a great day!

Yufna Soldier Wolf
nativenunu@yahoo.com

"While swimming in the sea of knowledge, I live in a world of ignorance and fear."GJ

