Appendix M. North Bend Draft Environmental Assessment Public Comments and Responses

Letter #	Comment #	Entity	Date of Comment	Comment	WAPA Response	Section in EA	Comment Topic
1	1	Federal Highway Administration (FHWA) – SD Division	3/16/2023	Thank you for the opportunity to review and comment on the draft EA for the North Bend Wind Project. The FHWA – South Dakota Division does not have any comment to the proposed undertaking.	Comment noted. Thank you for your review.	3.8	Transportation
2	1	South Dakota Department of Transportation (SDDOT)	4/3/2023	On behalf of the Pierre Area DOT we would like some more information on; • Projects expected length of development? • Projects anticipated starting date/duration? • Haul routes	Project development is anticipated to last nine months. Project construction is anticipated to start May or July 2023 and Project operation to last 30 years. See the response to Comment 2-2 for information on haul routes.	3.8	Transportation
2	2	SDDOT	4/3/2023	DOT has concerns about hauling routes and safety of truck crossings. We would also like to be included in discussion of and receive copies of haul routes for the project to ensure that all crossroads being used have good sight distance from either side of the highway, and that truck crossing signs are in place at these crossroads. This would require a permit from DOT. … FYI - DOT has two asphalt paving jobs on SD34 taking place in Hyde and Hughes Counties in 2024.	North Bend has worked with the SDDOT to finalize the transportation plan as stated in the Conservation Measures listed for Vegetation (Section 3.3.2) and Transportation (Section 3.8.2). North Bend, General Electric (GE), and WANZEK Construction (Project team) have participated in several joint calls with the Pierre Area Department of Transportation since this comment was submitted to WAPA. GE and WANZEK Construction plan to use Road SD 34 as the main haul route to move turbine components to the site. The current condition of SD 34 would not support the anticipated loads. As noted in the comment, the Pierre Area DOT plans to improve the roads by paving them with asphalt, which they have communicated will start in May 2023. North Bend LLC will require trucks on SD 34 to minimize their speed to reduce the risk of damage to the road. In addition, the North Bend LLC, Project team is considering an alternative route to haul equipment.	3.8	Transportation
2	3	SDDOT	4/3/2023	We would also be interested if trucks will be hauling legal loads per axle or if you'll be getting a permit for overweight axles.	Trucks will generally be hauling legal loads per axle. Additionally, North Bend LLC, has committed to obtaining SDDOT permits for any trucks in excess of the weight limits.	3.8	Transportation

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3	1	Mark and Mary Lee Klebsch 20350 326 AV Holabird, SD 57540	4/10/2023	We are totally in favor of the North Bend Wind project. Having the other wind farm a few miles away we have had no problems or issues with them. We love seeing the towers spinning and making much needed electricity. The benefits out weigh the construction period. It will have a large positive impact on the county and state. Looking forward to having them on our land.	Comment noted. Thank you for your review.	No section	General
4	1	The Nature Conservancy	4/14/23	The proposed North Bend Wind Project area is within the Missouri Coteau physiographic region, which provides important habitat for several grassland birds that are of conservation concern, including the whooping crane, marbled godwit, black tern, chestnut-collared longspur, Franklin's gull, northern harrier, bobolink, grasshopper sparrow, lark bunting, and greater prairie-chicken. Habitat loss and fragmentation is a prime contributor to the decline of these bird species. The Missouri Coteau is the last remaining stronghold of intact grasslands and wetlands in the Prairie Pothole Region, an area that spans Canada and five U.S. states, including South Dakota. This region provides reproductive habitat for 50-80% of North America's dabbling duck population and is also critical for other waterfowl, shorebird and songbird species. In addition to the benefits for global biodiversity, this habitat is important to South Dakota's hunting and outdoor recreation economy.	Section 3.3.1 of the Final EA has been updated to note the location of the Project in the Missouri Coteau physiographic region. Potential impacts to grassland birds and water birds are discussed in Section 3.4 of the EA.	3.3, 3.4	Vegetation and Land Cover Wildlife
4	2	The Nature Conservancy	4/14/23	The Nature Conservancy is supportive of renewable energy production, of which wind power is an important component, and we also support siting wind energy in a way that avoids detrimental effects to intact grassland systems and the biodiversity they support. When siting wind projects, we strongly encourage tower development on previously disturbed lands, such as those that have been converted to row crop agriculture, which are abundant in the state.	Section 2.1 of the Draft/Final EA discusses Project layout options that were considered by North Bend. The layout for the Project focused on siting infrastructure in previously disturbed lands (i.e., cultivated cropland, hay/pasture, and developed land) to the greatest extent practicable, although locating some Project facilities in grassland was unavoidable. 88 acres will be permanently impacted by the Project. Of these 88 acres, 42 acres are previously disturbed lands, and 46 acres are currently herbaceous vegetation.	3.3	Vegetation and Land Cover

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4	3	The Nature Conservancy	4/14/23	The Nature Conservancy's Site Renewables Right Tool offers insight on low-impact siting for renewable energy. By combining more than 100 data sets of sensitive habitats and species layers with wind and solar resources, engineering constraints and land use information, this tool provides a map of avoidance areas to protect biodiversity while pursuing renewable energy development.	Although we used different datasets for our analysis (see Section 3.0 of the Draft/Final EA), we appreciate the information on The Nature Conservancy's Site Renewables Right Tool.	No section	General
4	4	The Nature Conservancy	4/14/23	As it is currently proposed, the North Bend project would directly disturb more than 250 acres of untilled grassland during the course of the project.	Section 3.3.2 of the Draft/Final EA states about 264 acres of untilled grasslands would be temporarily disturbed during Project construction. Of these, about 43 acres would be permanently impacted due to Project operations.	3.3	Vegetation and Land Cover
4	5	The Nature Conservancy	4/14/23	More specifically, the Environmental Assessment notes that direct impacts to endangered species are likely. We agree that this is the case. The North Bend project area is within the identified whooping crane migration pathway and proposes to place turbines within 1 mile of suitable wetlands for whooping crane stopover sites. Research has suggested that whooping cranes use habitat that is within 3.1 miles of a wind turbine at a lower rate than expected. The North Bend Wind Project has indicated that site managers will conduct shut-down protocols of turbines within a 2-mile radius if whooping cranes are spotted. This is a necessary measure, but insufficient to address the effects on this endangered species. Due to their document avoidance of the structures, the proximity of turbines to suitable wetlands constitutes a loss of whooping crane migratory stopover habitat.	The potential impacts to whooping cranes referred to in the comment are discussed in Section 3.5.2 of the EA, as well in the Programmatic Biological Assessment Consistency Forms in Appendix E. The Consistency Forms state the shutdown protocols should be implemented within two miles of whooping crane sightings. Along with the turbine shutdown protocols referred to in the comment, North Bend will offset potential adverse impacts through the protection of an equivalent amount of wetland habitat, as discussed in the same sections noted above. The USFWS concurred with WAPA's determination that impacts to Whooping Cranes would be discountable and insignificant.	3.5, Appendix E	Threatened and Endangered Species
4	6	The Nature Conservancy	4/14/23	There is also an expected negative impact on grasslands used by prairie grouse for mating and nesting. The Environmental Assessment cites research that shows prairie grouse reduce their use of mating sites within 1.9 miles of a newly constructed wind turbine, and the North Bend project would place 40 wind turbines and 19 miles of access roads within 1 mile of a known mating site for prairie grouse.	Thanks for your comment. The potential impacts to prairie grouse (i.e., sharp-tailed grouse and greater prairie chickens) referred to in the comment are discussed in Section 3.4.2 of the Draft/Final EA.	3.4	Wildlife

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4	7	The Nature Conservancy	4/14/23	Finally, the construction and continued maintenance of turbines and the roads built to each turbine will have negative impacts on currently undisturbed grasslands. In addition to the disturbances to grasslands and compaction of soil during construction, these roads will continue to be conduits for invasive weeds. Invasive species degrade the biodiversity of the grassland and reduce the habitat quality for wildlife and livestock. Should the project be approved for interconnection, we strongly recommend that practices that are used to reconstruct habitat post-construction use high diversity seed mixes of native grasses and forbs and that a long-term plan to treat and reduce noxious weeds and invasive species around the facility is developed and adhered to.	North Bend has committed to restoring grassland habitat disturbed during construction using native grass and forb seed mixes based on recommendations found in section 5.1.2 of the PEIS, as described in Section 3.3.2 of the Draft/Final EA. In addition, noxious and invasive weeds will be managed in accordance with a Project Noxious and Invasive Weed Management Plan, as required under the South Dakota Public Utilities Commission (PUC) facility permit.	3.3	Vegetation and Land Cover
4	8	The Nature Conservancy	4/14/23	As stated in their Biodiversity Notebook 2022, the ENGIE Group has adopted a process to include biodiversity considerations in their project analysis that ultimately recommends abandoning projects where negative impacts cannot be avoided or offset. In light of their stated biodiversity considerations, and the science-driven comments we've shared, we encourage a thorough review for the best options that will ensure protection of this sensitive ecosystem.	Thank you for your comment. Interpreting a private business policy statement is beyond the scope of this NEPA document. WAPA, USFWS, and SD Game, Fish, & Parks have recommended voluntary measures to offset grassland impacts. North Bend LLC has agreed to collaborate with SD Game Fish & Parks staff to assess impacts to nesting grassland birds at the North Bend Wind Project, as described in Section 3.4.2 of the Draft/Final EA. Research focused on the effects of wind development on nesting grassland birds will help increase knowledge of the impacts on these species, which could contribute to the implementation of more effective mitigation on future projects.	3.3	Vegetation and Land Cover

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5	1	Doug Knox Box 412 Highmore, SD 57345	4/17/2023	I am writing in regards to the letter you sent out asking for input on the North Bend Wind Project. Your maps for the project include 6 ½ quarter sections (around 1040 acres) of our families ground that have never been under contract. In fact we have asked on numerous occasions to have our ground removed from the project maps. Yet you (WAPA) have provided another document (Environmental Assessment) and included this land. None of this land has ever been under contract, but yet is always misrepresented as such. In your EA document this land is all within the project boundary (Figure 2.2-1). No permission was ever asked or given to enter any of this ground for any environmental assessment. Thus putting our land, and many of our neighbors land (also not under contract) seems very misleading and one would have to question the integrity of an Environmental Assessment in that area. This has been a very frustrating situation for our family knowing the boundaries could easily have been drawn to exclude our (and neighbors) ground. I have enclosed the figure 2.2-1 with all the non participating land/landowners shaded out of the southeast boundary. I would like for you to explain why WAPA is now misrepresenting us in your Environmental Assessment.	Thank you for your comment. As noted in the legend of the map (Figure 2.2.-1), the map was produced by ENGIE and their consultant WEST. This is part of the private developer's business proposal and WAPA has no public ownership interest in the proposed project. WAPA's scope and authority is limited to granting or denying an interconnect request by the developer to our transmission line. WAPA evaluates the privately proposed wind farm as a connected action under the National Environmental Policy Act. WAPA does not condone trespassing and is unaware of any trespassing occurrences. ENGIE/North Bend confirmed that not all acreage in the gross Proposed Project Area boundary is under lease, and that the lease status of acreage is dynamic. As a result, the Figure 2.2-1 isn't being revised, however we have clarified throughout our EA text to show that this a "proposed" project area only.	General	General