

Appendix C

Comprehensive List of Scoping Comments

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Air Quality

The EIS analysis should consider the affects of road dust and increased traffic volume and a detailed should be developed that included dust suppression methods, inspection schedules, and documentation processes.

The EIS should quantify the annual greenhouse gas emission that would occur from the project during construction, operation, maintenance, and inspection activities and describe voluntary measures to reduce greenhouse gases.

Degradation of air quality to historic trails, particularly during construction should be evaluated in the EIS.

The issue of ozone generated from electric power production and the effects of ozone on air quality should be addressed in the EIS.

The EIS should address and disclose the project's potential affect on: all criteria pollutants under the NAAQS, including ozone, visibility impairment, and air quality-related value in the protection of any affected Class I areas.

The EIS should consider impacts associated with airborne dust during construction such as visual and public health and safety.

The EIS should address the protection of air quality and disclose all types of fuels used during construction activities, the increase traffic during operations, and the related VOC and NOx emissions and their effects to air quality and human health.

Alternatives

Recommends that the BLM not pursue an amendment to the RMP that would allow for development of the project in a VRM Class III area. The alternatives analysis must consider all reasonable alternatives that prevent visual impacts to VRM Class III areas.

Wind farms are permanent fixtures, as such, the siting of the turbines is critical to reduce impacts to the landscape.

When siting utility corridors and facilities, areas to avoid should include:

- Foreground zone should be avoided to reduce visual impacts;
- significant cultural, historic, and natural value
- USFS semi-primitive non-motorized areas and NPS natural areas
- wilderness areas and their adjacent buffer zones
- sage-grouse breeding areas

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

The evaluation should consider alternative sites such as the reclaimed mine land in the Hanna, WY area.

BLM should consider a phased wind development program as an alternative, so that a comprehensive monitoring and research program can be conducted on impacts to wildlife and habitat resulting from this large-scale project and the other developments that are occurring in the region.

The alternatives analysis must consider all reasonable alternatives that prevent impacts to the sage grouse.

Project alternative selected should be one where construction or any other activity does not impact waters of the U.S. (under Section 404 of the Clean Water Act (CWA)).

Biology Resources

Avian Species and Bats

Once key bird habitats are avoided, it is recommended that dense clusters of turbine configurations (parallel rows of wind turbines closely aligned, but with alternating tower heights) to reduce raptor mortalities.

Avoid areas with concentrations of raptor nests by not less than one mile.

Suggests using radar to observe avian and bat movements during pre-construction and post construction to determine changes.

Suggests that the overhead transmission line be buried, or at least in high impact areas, to reduce impacts to raptors.

Recommends that wind turbines not be sited in canyons to reduce the potential of golden eagle fatalities.

Pre-siting surveys of bird habitat use and migration pathways, as well as raptor and mountain plover nesting areas should be conducted prior to determining tower locations and arrays.

Develop a comprehensive analysis of the seasonal timing restrictions and a development plan that is applied to all species.

Bald eagle, great blue heron, and double-crest cormorant nests along the Platte River and riparian areas near the Chokecherry project area should be surveyed and identified prior to construction.

Fall and spring pre-construction surveys should be conducted for all migrating species as there have been documentations of swan located in both the Peaking and Kindt Reservoirs which may indicate an important migration corridor.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Concern about daily human presence during project maintenance could have negative effects to wildlife, particularly during breeding and nesting periods for sage-grouse, raptors, and mountain plovers.

Implement mitigation to decrease the level of avian and bat fatalities, particularly passerines and hoary bats. Suggest different color turbines so that birds can see them.

The BLM should adopt the American Society of Mammalogists recommendations for wind projects with respect to impacts to bats.

Wind turbines should be setback 50m from the rim to prevent mortality of raptors "surfing" on updrafts at the windward slope of the rim.

The EIS should evaluate the potential avian mortalities resulting from turbine collisions and design and implement mitigation to minimize mortalities because these mortalities could have a significant impact on local bird populations.

The EIS should consider nocturnal migrations of songbirds which may maintain altitudes above ridge tops. May consider wind turbine arrays with tops of blades positioned lower than nearby ridge tops to reduce mortality rates.

Turbines should be sited to minimize potential impacts to native passerines, particular BLM Sensitive Species such as the sage sparrow, Brewer's sparrow, and sage thrasher.

Wind turbines should be sited one mile from woodland habitats to reduce impacts to bats.

Bat surveys should be conducted to identify populations of hoary and silver-haired bats in the project area as well as foraging habitats and migration pathways used by these species.

Turbines should be set to have a minimum speed of 6 meters per second to avoid increased mortality risk to bats at slower speed.

Extreme noise in the project area should be avoided during nesting season or near occupied nests during construction.

Travel restrictions and other mitigation measures should be implemented to avoid disruption of nesting/brooding sites during project operations.

The EIS should address compliance with the Bald Eagle Protection Act and Migratory bird Treaty Act and ensure enforcement of them relative to raptors and other bird species protected by these laws.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Conduct pre-construction avian use study to identify high use areas for birds and bats to aid in siting turbine locations and to avoid collision with turbine blades.

Pre-construction surveys should identify prairie dog towns because of their importance to bird species.

The EIS should evaluate impacts to prairie-dog towns which support numerous species of high priority including the mountain plover, burrowing owl, black-footed ferret, and kit fox.

Wind turbines should not be sited in areas where there are concentrated raptor nest sites to avoid fledging raptors from encountering wind turbine blades.

Sage-grouse Care should be taken during construction of roads and siting of turbines to reduce impacts to sage-dependent species including sage-grouse.

Impacts to sage grouse core areas within the Chokecherry project area could be avoided by careful siting of turbines.

Turbine and road siting should not occur near sage-grouse leks, particularly during the nesting season.

Implement measures to mitigate impacts to the Greater Sage-Grouse and Columbian sharp-tailed grouse in both the Sierra Madre and Chokecherry units.

Wind turbines should not be located closer than 5 miles from sage grouse leks.

Adequate and suitable sagebrush habitat should be protected to prevent a further decline in the Greater sage-grouse populations.

Concern about turbines providing a perching vantage for raptors that will endanger sage grouse.

The EIS should evaluate the direct sage grouse habitat loss due to fragmentation of sagebrush habitat from project development.

Siting methodology and protocol should be part of the proposal review so that impacts to sage-grouse breeding areas are minimized.

Noise mitigation for sage-grouse should be attained at no more than 200m from potential noise sources.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

The EIS should evaluate expected impacts and habitat avoidance to sage grouse from construction of turbines, transmission lines, and other above ground facilities as sage grouse tend to instinctively avoid tall structures used by raptors.

The BLM should consider Wyoming Game and Fish Department's "Recommendations for Development of Oil & Gas Resources within Crucial & Important Wildlife Habitat" with regards to protection of the sage grouse.

The BLM should ensure that the proposed project not degrade or destroy the sage grouse core area where the Chokecherry area intrudes.

All powerlines should be buried and partial reclamation of access roads should be considered as mitigation for sage grouse.

Surveys for new or undiscovered leks should be conducted annually to ensure that the proposed project development does not impact sage grouse populations and leks.

The EIS should consider mitigation such as temporary shutdown of construction sage grouse strutting periods from March 1 through May 15 and avoided from 6 pm until 9 am within 2 miles of strutting grounds.

Dense stands of sage brush should be protected for sage grouse wintering habitat.

Big Game

Include detailed studies on mule deer to establish measures to reduce risk for fatalities, or risk quantification.

The EIS should evaluate the impacts to mule deer migration across the North Platte River with the upgrading of County Road 347.

The project should include a rigorous before-after-control study to determine project construction and operations impacts to mule deer as well as pronghorn.

Suggests that no construction activity should occur inside or within 2 miles of crucial ranges or migration corridors during use by big game.

The Sierra Madre portion of the project will adversely affect big game winter range; wind turbines, access roads, and power lines should be located at least three miles from big game winter range.

Winter stipulations should be implemented for all big game species, particularly Chokecherry North 04 and 03 areas and potentially the proposed electric substation site, which is within crucial winter habitat for mule deer.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Crucial winter ranges and migration corridors should be closed to vehicle use and human presence minimized during wildlife use.

In the Sierra Madre unit, concerns about elk crucial winter habitat in the northwest portion and displacement of elk during the construction phase and should be carefully evaluated in the EIS.

Turbine arrays should avoid areas of concentrated bat use; if sited across migration routes, turbines should be seasonally disabled during migration seasons.

In the Chokecherry unit, concerns about project impacts to winter/yearlong range for antelope, crucial winter habitat for mule deer, and greater sage-grouse habitat.

BLM should consider the Western Governor's Association Western Renewable Energy Zones (WREZ), which will be published in Oct. 2008 to protect wildlife migration and crucial wildlife habitats.

Concern about trapped big game, particularly pronghorn from plowed roads and snow berms during winter months.

The EIS should evaluate impacts to the Platte Valley mule deer herd habitat and fragmentation of these habitats due to project development.

The Chokecherry project area is crucial year-round habitat for mule deer; noise from the project should not disturb big game during critical periods such as parturition.

The EIS should identify areas where displaced elk would relocate and evaluate whether that habitat is suitable for elk, particularly in the Sierra Madre portion of the project area.

Fisheries

The EIS should evaluate the use of County Road 347 south of Fort Steele for impacts to contamination of the North Platte River and fisheries.

Sediment should be controlled during construction in the Sierra Madre portion of the project to avoid sediment transport to the North Platte River, City of Rawlins Reservoir, and upstream Sage Creek to reduce impacts to sport fisheries.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

A comprehensive monitoring plan for aquatic resources should be developed to determine any negative impacts resulting from construction of the proposed project.

Other Species Concerns

The project area should be surveyed for the presence of the Wyoming pocket gopher and if needed, the appropriate mitigation to preserve the habitat should be applied.

BLM should conserve sensitive species that occur in the project area in a manner that contributes to their removal from BLM's sensitive species (e.g. the sage-grouse, pygmy rabbit, white-tailed prairie dog, and possibly the burrowing owl).

A survey for presence/absence of the midget faded rattlesnake within the project area should be conducted. Wyoming Fish and Game can provide protocol.

Other Biology Concerns

Adopt adaptive management protocols to adjust approaches for reducing wildlife fatalities and habitat-related impacts.

Conduct wildlife studies before and after construction to aid in identifying mitigation and to have an understanding of cumulative impacts.

The EIS should detail access plans to turbines during all seasons, particularly winter and evaluate the potential effects to wildlife from snow machine traffic.

Suggested mitigation to reduce impacts to nesting of all affected species should include: temporal restrictions, relocation of project turbines, and installation of artificial nesting platforms away from project facilities.

The EIS should evaluate potential impacts to wildlife habitat in the Sierra Madre project area where the Grizzly Wildlife Habitat Management Area is located.

The EIS should evaluate long-term impacts from development of roads and transmission line networks to wildlife, particularly, induced growth of residential areas from subdivision of property.

Provide current inventory studies and analysis of wildlife habitat and species as well as current riparian and stream habitat conditions.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Recommend that adaptive management be used as a tool to adjust the project as needed to accommodate new findings/studies to mitigate impacts to wildlife and wildlife habitat.

Requests that the BLM adhere to policies set forth in the new Rawlins RMP that excludes and avoids sensitive resource values; in particular, as it relates to sage grouse breeding areas.

Disclose current inventory studies and conduct a full analysis of wildlife habitat, wildlife species, and current riparian and stream habitat conditions.

When considering impacts to wildlife, the impacts analysis to wildlife should also consider indirect, connected, related, long-term, and cumulative impacts in a quantitative and scientifically-supported manner.

The EIS should evaluate the effects of the proposed project on the area ecology, including wildlife and their habitat and vegetation.

Concerned that project will grow beyond the initial size and result in further adverse affects to wildlife resources.

Mitigation measures should include construction and operations restrictions and intervening fences to increase crucial winter habitat available to mule deer.

The project area should be surveyed for presence of pygmy rabbit and if documented, the appropriate mitigation should be applied.

The project area should be surveyed for the presence of the Wyoming pocket gopher and if needed, the appropriate mitigation to preserve the habitat should be applied.

The EIS should evaluate the impacts to sage grouse from communication networks and identify mitigation to minimize the impacts.

Construction

Bridges over perennial streams should be used during construction.

The EIS should evaluate development, maintenance, and reclamation of access roads used for construction of the wind farm.

Construction techniques to reduce dust and sedimentation runoff should include 95% base compaction prior to placement of culverts, etc. using the appropriate dust control methods (e.g. non-chlorine based dust abatement chemical treatment).

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

To prevent water contamination during construction and operation, preserve existing vegetation during clearing and grading and divert upland runoff around exposed soils.

To prevent water contamination during construction and operation, install sediment traps and settling basins to reduce the velocity of channeled runoff.

To prevent water contamination during construction and operation, protect slopes and channels from gullying.

Cultural Resources

Historical legacy of area communities should be conserved.

Concerned about project impacts to view sheds from the Overland Trail, which is eligible for listing on the Register of Historic Places.

The Sierra Madre One portion of the project should not be visible from historic trails.

The BLM should be diligent in requesting the views of tribal officials and traditional/religious leaders.

A designated a buffer should be established for cultural resources identified for greater protection.

A comprehensive monitoring and cultural resource discovery plan (similar to the one prepared for the Piceance Basin Lateral project) should be developed to ensure training of heavy equipment workers and better protect historical resources.

Cultural resource specialists should be involved in siting turbines, particularly the historic trails.

When siting utility corridors and facilities, areas with important trail values, such as a sense of remoteness, should be avoided.

The Alliance for Historic Wyoming requests inclusion on all matters associated with Section 106 consultations for the project.

Formal consultation with Native American tribes should take place to identify Traditional Cultural Properties to avoid impacts to these resources.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Cumulative Impacts

Cumulative impacts to wildlife from this project in addition to all the nearby energy extraction projects, particularly in the Sierra Madre should be considered.

The cumulative impacts analysis should describe a benchmark or baseline and include scientifically defensible threshold levels.

"Connected actions," "cumulative actions," and as well as "similar actions" (40 C.F. R. 1508.2) should be considered as part of the scope of this project. Similar actions defined as other wind projects.

Develop a landscape scale cumulative impacts analysis that addresses the ongoing and future development within and outside the proposed project area; include impacts to crucial habitat and address the issue of species being pushed to less suitable habitat.

Cumulative impacts study boundary should be analyzed according to air sheds and watersheds, not political boundaries.

Suggests using EPA guidance on cumulative impacts - "Consideration of Cumulative Impacts in EPA Review of NEPA Documents."

The cumulative impacts should consider other major projects being developed in the area such as the Atlantic Rim and Continental Divide-Creston and the associated impacts to livestock grazing.

Decommissioning

Facilities no longer needed should be removed as soon as practicable.

Grazing/Rangeland

The EIS should consider the effects of reduced forage and how livestock will be managed to protect water resources when less forage is available to them.

The analysis should include the evaluation of impacts to the important environmental, social, and historic values of livestock for the area.

The proposed project will increase off- and on-road traffic, which could result in an increased death in livestock and AUMs.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Encourages BLM to work with grazing permittees and agricultural producers to understand the impacts associated with the proposed project.

The proposed project will decrease palatability of vegetation and forage for livestock from road dust and development activities.

The project will have adverse impacts on grazing permittees, agricultural producers, and landowners both within and near the project area.

The proposed project could be detrimental the economics of livestock management operations.

Hazardous Materials

If pesticides and herbicides are used for vegetation treatment during project operation, the EIS should address potential toxic hazards and ensure toxic substances released to the environment are minimized.

To prevent water contamination during construction and operation, identify areas and procedures for fueling, and provide a protected vehicle washout.

The WQD must be notified of spills or releases of chemicals and petroleum products; the EIS should restate this requirement and explain how soils, groundwater and surface water impacted from spills or leaks will be restored.

To prevent water contamination during construction and operation, ensure materials and education for cleaning up spills and leads.

Concern about water quality impacts should corrosive preventatives be used on the project and introduced into water runoff to surface waters.

To prevent water contamination during construction and operation, store chemicals for project activities in covered containers in a specific location.

Land Use

Access easements in nearby areas should be identified to mitigate the potential loss of access for hunting.

Impacts to the Wyoming Fish and Game easements along the North Platte River from upgrading of County Road 347 should be evaluated in the EIS.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Impacts to hunter access to Miller Hill should be addressed in the EIS. Direct and indirect impacts to hunters would also occur within Sierra Madre sections 1, 4, and 3 as well as the 50-acre site proposed for the substation.

Project should consider landowner and hunter concerns.

The EIS should evaluate long-term impacts from development of roads and transmission line networks to wildlife, particularly, induced growth of residential areas from subdivision of property.

When siting utility corridors and facilities, USFS semi-primitive non-motorized areas and NPS natural areas should be avoided.

Mitigation to reduce property subdivision resulting from project development could include: reclaim all roads no longer needed for construction, remove power lines/ facilities no longer needed, and/or acquire conservation easements on private land.

Measures should be considered to mitigate the impacts associated with loss of public lands.

Approximately 980 acres of surface estate and 20 acres of mineral estate of state lands are located north of the project area and managed by the Wyoming State Penitentiary, but would be subject to state lands rules and regulations W.S. 36-2-107 and W.S. 36-9-118

Potential loss of public access should be mitigated off-site. Recommends additional access to the North Platte River across checkerboard between Pick Bridge and Seminole Reservoir for sport fishing.

Approximately 6,000 acres of state trust mineral estate and 4,858 acres of state trust surface estate lie within the proposed project boundary; compliance with W.S. 36-2-107 and W.S. 36-9-118 if development occurs on, or traverses state lands.

Maintenance

Winter maintenance should use snow-cats instead of trying to maintain clear roads.

Consider harsh winters and the availability of workers to maintain the project during winter months.

Project maintenance should consider road plowing during the winter.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Minerals

Parts of the Chokecherry project area are located within a portion of the Kindt Basin which contains substantial reserves of high quality Mesaverde coal.

The EIS analysis should include an analysis of potential impacts to mineral resources from development of the proposed project.

BLM should impose best management practices developed in its Final Wind Energy PEIS to avoid potential conflicts with mineral resource development.

The EIS analysis should include an evaluation of whether land with mineral resources should be excluded from wind energy development (as developed in BLM's Final Wind Energy PEIS).

Mitigation and Monitoring

The final decision must include mitigation and performance-based reclamation for all impacts.

Decisions about the proposed project should be made on a site-specific, case-by-case that are in the best interests of the landowners and affected resources.

Implement measures to mitigate impacts to the Greater Sage-Grouse and Columbian sharp-tailed grouse in both the Sierra Madre and Chokecherry units.

Bridges over perennial streams should be used during construction.

Evaluate, mitigate, and develop a plan for managing invasive plant species as these plants have a detrimental effect on wildlife, native plants, and recreation.

Suggests the BLM use the Rawlins Field Office's Disturbance/Reclamation Reporting Database along with photo points of discrete sites and stream/ephemeral draws to aid in project monitoring.

Develop action plans for monitoring, addressing thresholds, and mitigation for wildlife.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Mitigation measures should include construction and operations restrictions and intervening fences to increase crucial winter habitat available to mule deer.

To prevent water contamination during construction and operation, inspect the effectiveness of best management practices.

Encourages the BLM to implement a comprehensive monitoring and cultural resource discover plan (similar to the one prepared for the Piceance Basin Lateral project) to ensure training of heavy equipment workers and better protect historical resources.

Wind turbines should be setback 50m from the rim to prevent mortality of raptors "surfing" on updrafts at the windward slope of the rim.

Concern about sufficient monitoring of project during operations.

BLM should consider a phased wind development program so that a comprehensive monitoring and research program can be conducted on impacts to wildlife and habitat resulting from this large-scale project and the other developments occurring in the region.

The EIS should provide information on CWA Section 303(d) impaired waters, describe existing restoration efforts, how the project will coordinate with these efforts, and any mitigation measures that will be implemented to avoid further degradation.

The EIS should clearly describe water bodies and groundwater resources within the area that may be impacted by project activities and the appropriate BMPs should be applied to reduce potential non-point sources of pollution.

Mitigation to reduce impacts to nesting of all affected species should include: temporal restrictions, relocation of project turbines, and installation of artificial nesting platforms away from project facilities.

Detailed plans for addressing dust control should be developed and include: dust suppression methods, inspection schedules, and documentation processes.

The EIS should analyze both the direct and cumulative effects of increase soil exposure and identify the BMPs that will be used or mitigation measures, should the BMPs or reclamation fail.

Adopt adaptive management protocols to adjust approaches for reducing wildlife fatalities and habitat-related impacts.

Implement a monitoring system and action plan for detecting spills in the proposed project area to avoid adverse impacts to streams and water quality.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

All decisions to protect water quality in the EIS should data-based with a detailed discussion of BLM's monitoring strategies throughout the life of the project.

The EIS should evaluate long-term impacts from development of roads and transmission line networks to wildlife, particularly, induced growth of residential areas from subdivision of property.

Mitigation to reduce property subdivision resulting from project development could include: reclaim all roads no longer needed for construction, remove power lines/ facilities no longer needed, and/or acquire conservation easements on private land.

Project area should be reduced and located in non-sagebrush habitats, proper tower siting specifications, and off site mitigation should be considered to reduce impacts to sage grouse.

Mitigation measures should be developed to reduce impacts to raptor populations.

Encourages the planning and siting team to work with the Continental Divide Trail Alliance to identify key areas of avoidance and mitigation.

BLM should impose best management practices developed in its Final Wind Energy PEIS to avoid potential conflicts with mineral resource development.

Recommended mitigation by the CDTA: relocation of existing smaller capacity transmission lines to the corridors identified in the EIS and reclamation of those sites.

Travel restrictions and other mitigation measures should be implemented to avoid disruption of nesting/brooding sites during project operations.

EIS analyses should comply with BLM's programmatic policies and BMPs in addition to site-specific considerations.

Training and monitoring of employees during construction should be enforced.

Develop a comprehensive analysis of the seasonal timing restrictions and the development plan that is applied to all species.

BLM should adhere to IM 2006-216 relative wind energy developments.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Measures should be considered to mitigate the impacts associated with loss of public lands.

All alternatives considered in the EIS should have detailed descriptions of preventive measures, reclamation plans and mitigation plans to protect water quality.

Conduct wildlife studies before and after construction to aid in identifying mitigation and to have an understanding of cumulative impacts.

The EIS should address mitigation to alleviate direct, ancillary, and cumulative impacts to the Continental Divide Trail including on-site and off-site.

Implement new technologies as they are developed to increase mitigation effectiveness.

The EIS should evaluate the potential avian mortalities resulting from turbine collisions and design and implement mitigation to minimize mortalities because these mortalities could have a significant impact on local bird populations.

Recommended mitigation by the CDTA: funding for trail development and maintenance, corridor management, ROWs acquisition, and trailhead developments.

The Final EIS and Record of Decision should include a thorough analysis of impacts and mitigate the increased costs and reduced revenues for grazing permittees in the project area.

Construction techniques to reduce dust and sedimentation runoff should include 95% base compaction prior to placement of culverts, etc. using the appropriate dust control methods (e.g. non-chlorine based dust abatement chemical treatment).

Recommends that the BLM not pursue an amendment to the RMP that would allow for development of the project in a VRM Class III area. Instead siting and mitigation should be applied to the project to meet management objectives of VRM Class III.

Recommended mitigation by the CDTA: removal of facilities no longer needed.

Implement mitigation to decrease the level of avian and bat fatalities, particularly passerines and hoary bats. Suggest different color turbines so that birds can see them.

Winter stipulations should be implemented for all big game species, particularly Chokecherry North 04 and 03 areas and potentially the proposed electric substation site, which is within crucial winter habitat for mule deer.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

The BLM has the responsibility to plan and mitigate the proposed project through careful siting decisions.

NEPA/RMP/Regulations

When considering impacts to wildlife, the impacts analysis to wildlife should also consider indirect, connected, related, long-term, and cumulative impacts in a quantitative and scientifically-supported manner.

All stakeholder agencies, including the State of Wyoming should be involved early in the planning process to identify wildlife impacts, develop monitoring programs and establish efficient dual permitting process (e.g. with the state siting office).

The BLM's analysis should prevent unnecessary or undue degradation to the environment as stated in FLPMA (43 USC 1732[b]).

The EIS should include a range of reasonable alternatives that meet the stated purpose and need for the project and that are responsive to the issues identified during the scoping process.

EIS analyses should comply with BLM's programmatic plan and policies for wind energy development and BMPs.

The Chokecherry Project should comply with the BLM's programmatic plan for wind energy development.

BLM must comply with existing laws for protection of BLM sensitive species including implementing management plans that preserve candidate species and their habitats and that ensure federal actions do not contribute to the listing of a species.

BLM should consider the project's access to transmission lines and whether this access would be considered a connected action.

BLM should conserve sensitive species that occur in the project area to a level that would contribute to their delisting from BLM's sensitive species list (e.g. the sage-grouse, pygmy rabbit, white-tailed prairie dog, and possibly the burrowing owl).

The environmental analysis should "insure that the policies and goals in [NEPA] are infused into the ongoing programs and actions of the Federal Government." 40 CFR 1502.1

BLM should consider compliance with Wyoming Industrial Information and Siting Act.

BLM should adhere to IM 2006-216 relative wind energy developments.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

BLM must manage and conserve candidate and sensitive species where authorized actions have a significant effect on their status (See BLM Manual MS-6840.06.C.2).

As part of the scope of this project, BLM must consider "connected actions," "cumulative actions," and "similar actions." 40 C.F. F. 1508.2. Similar actions defined as other wind projects.

Noise

Extreme noise in the project area should be avoided during the nesting season or near occupied nests during construction.

The EIS should evaluate expected noise levels during construction and operation to identify potential noise impacts to sage-grouse during courting.

The Chokecherry project area is crucial year-round habitat for mule deer; noise from the project should not disturb big game during critical periods such as parturition.

Concern about noise impacts from historic trails.

Impacts of project noise to hunters and the hunting experience should be considered in the environmental analysis.

Noise mitigation for sage-grouse should be attained at no more than 200m from potential noise sources.

The BLM should consider turbine noise and shadow flicker in the EIS analysis should the project be located near primary access roads and human dwellings.

Project Description

The BLM has the responsibility to plan and mitigate the proposed project through careful siting decisions.

Concerned that project will grow beyond the initial size and result in further adverse affects to wildlife resources.

Conduct a site evaluation that includes local expertise, databases, literature search, T&E species, and critical habitats to screen sites and make determinations about appropriate siting decisions.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Meteorological towers should be unguayed to reduce avian and bat mortality.

Analyze and review the BLM's Programmatic EIS of 2005 for validity of wind facilities taking only 5 to 10% of the total site area. Determine actual footprint of the proposed project and disclose in the EIS.

The proposed project size should be reduced.

The lower section of the Sierra Madre portion of the project should be removed from the proposal because of potential impacts to winter range and conflicts with wildlife.

The EIS should consider nocturnal migrations of songbirds which may maintain altitudes above ridge tops. May consider wind turbine arrays with tops of blades positioned lower than nearby ridge tops to reduce mortality rates.

Public Participation

The BLM needs to ensure that local concerns are fully addressed and community support obtained, particularly where the project is visible.

Recommends an open and meaningful process for public input to avoid lawsuits and ordinances that will slow the permitting process.

Public Safety

Carbon County Fire Department recommends the project not be built if suitable access is not identified because of rough terrain and poor conditions during the winter.

The EIS should consider impacts associated with airborne dust, such as visual effects and affects to public health and safety.

Reclamation

Reclamation of project sites and road edges should be considered because of project impacts to vegetation.

Monitoring and eradication of noxious weeds should be implemented until the desired vegetation is established.

New and temporary roads and disturbed areas should be reclaimed in a timely and successful manner.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

The final decision must include mitigation and performance-based reclamation for all impacts.

The EIS should analyze both the direct and cumulative effects of increase soil exposure and identify the BMPs that will be used or mitigation measures should the BMPs or reclamation fail.

An alternative should be considered to allow the cranes to move overland, reducing the need for road building and costly reclamation in an environment where reclamation is slow. This would reduce impacts to water quality and other resources.

Recreation

The BLM should maintain current day recreational use within the Sierra Madre and Chokeycherry units.

Concerns about impacts to hikers' view shed using the Continental Divide Trail.

Impacts associated with hunter access to public lands, particularly due to the checkerboard land ownership, should be addressed in the EIS.

The Continental Divide Trail is a designated area, as such; the EIS should evaluate impacts to recreational experiences within, intersected by, or otherwise impacted by the proposed project.

Potential loss of public access should be mitigated off-site. Recommends additional access to the North Platte River across checkerboard between Pick Bridge and Seminole Reservoir for sport fishing.

Loss of hunting opportunities, particularly Antelope areas 56, 108, 52, and 53; mule deer areas 83, 84, 80, and 82; elk hunt areas 108, 130, 21, and 15, are of great concern as a result of project developments

When siting utility corridors and facilities, areas with important Trail values, such as a sense of remoteness, should be avoided.

Impacts to hunter access to Miller Hill should be addressed in the EIS. Direct and indirect impacts to hunters would also occur within Sierra Madre sections 1, 4, and 3 as well as the 50-acre site proposed for the substation.

The EIS should evaluate the potential conflicts between development and recreational activities.

Should loss of access for hunting occur, the loss should be mitigated by access easements in nearby areas.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Communicate public access to all public lands within the area.

Closure of private lands and access to public lands could impact recreational hunting, particularly Antelope Hunt Area 56, Deer Hunt 83, and significant portions of Antelope Hunt 108, Deer Hunt 84, Elk Hunt 108 and Elk Hunt 130.

Adopt Executive Order 13443, which focuses on expanding and enhancing hunting opportunities on public lands.

Impacts of project noise to hunters and the hunting experience should be considered in the environmental analysis.

Concern that hunting will be banned in the area as a result of project development.

Project should consider landowner and hunter concerns.

Sediment should be controlled during construction in the Sierra Madre portion of the project to avoid sediment transport to the North Platte River, City of Rawlins Reservoir, and upstream Sage Creek to reduce impacts to sport fisheries.

Locate utility corridors where the Continental Divide National Scenic Trail crosses areas already developed and classified as Rural or Urban by the USFS Recreation Opportunity Spectrum.

Recommends consistent approach to treatment and recognition of the CDNST and other scenic and historic trails affected by the proposed project.

Funding for trail development and maintenance, corridor management, ROWs acquisition, and trailhead developments are recommended as mitigation for impacts to the Continental Divide National Scenic Trail.

Socioeconomics

Question about the expected employment for the wind farm following construction.

Wind farms should last longer than 20 years.

Supports wind energy project because it will generate revenue for the state.

Social and environmental affects should be considered for this project similar to oil and gas.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Project will provide long-term jobs and long-term economic advantages.

The EIS should analyze the economic impact of the proposed project, identifying the number and types of jobs, whether workers will be local, and what the projected tax revenues for the state and county will be.

The proposed project will be detrimental the economics of livestock management operations.

The proposed project provides little benefit to Carbon County as the power will benefit California, Nevada, and Arizona.

EIS evaluation should consider the project's affects on tourism.

A socioeconomic program should be developed for this project.

Question about how many jobs would the proposed project generate.

Question about whether the project will help stabilize Carbon County's electrical costs.

The EIS should disclose and evaluate environmental justice issues consistent with EO 12898 for impacts to rural low-income communities or potential associated actions for the reasonably foreseeable development analysis.

Question about how the proponent can be a good corporate citizen in Rawlins.

Encourages utilization of local workforce.

Soils

Requests that the sponsoring agency of the proposed project compile the site assessment portion of the form AD-1006 (attached to original comment letter) if the project has the potential to convert farmland to non-agricultural use.

To prevent water contamination during construction and operation, divert upland runoff around exposed soils.

Clearing land for roads, turbine pads, and other structures will expose soil to water and wind erosion in an area vulnerable to erosion because of the soil type and steep topography.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Recommends siting turbines and access roads away from steep or unstable slope or areas of high erosion potential.

Disturbance of soils during construction and permanent roads could cause erosion.

To prevent water contamination during construction and operation, install sediment traps and settling basins to reduce the velocity of channeled runoff.

To prevent water contamination during construction and operation, use sediment barriers to trap soil in runoff where sheet flows occur.

The EIS should analyze both the direct and cumulative effects of increase soil exposure and identify the BMPs that will be used or mitigation measures should the BMPs or reclamation fail.

Special Management Areas

Wilderness areas and their adjacent buffer zones should be avoided.

The EIS should evaluate potential impacts to wildlife habitat in the Sierra Madre project area where the Grizzly Wildlife Habitat Management Area is located.

Transmission Lines

Encourages the planning and siting team to work with the Continental Divide Trail Alliance to identify key areas of avoidance and mitigation.

Locate utility corridors in areas other than those with important Trail values, such as a sense of remoteness.

Utility corridors could be buried underground through open areas.

Locate utility corridors by upgrading into one line or co-aligning with existing lines.

Locate utility corridors where the CDNST crosses an existing highway or highway intersection.

Relocation of existing smaller capacity transmission lines to the corridors identified in the EIS and then reclamation of those sites.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Suggests that the overhead transmission line be buried, or at least in high impact areas, to reduce impacts to raptors.

The EIS should carefully review the height and type of power line towers.

Question about where the transmission line that carries power out of the county be routed.

BLM should consider the project's access to transmission lines and whether this access would be considered a connected action.

Transportation

Gravel roads should not be used for construction and maintenance of turbines; instead lower-impact alternatives such as jeep trails or no designated access should be used.

The EIS should evaluate the effects of proposed road improvements, new road, and general ROW construction including increased access, travel management and enforcement as well as impacts to flora and fauna.

Concern that improvements to existing roads will reverse Clean Water Act Section 319 non-point source projects that have been funded in the Sage and Muddy Creek watersheds.

Concern about increase traffic volumes resulting from construction of the proposed project.

An alternative should be considered to allow the cranes to move overland, reducing the need for road building and costly reclamation in an environment where reclamation is slow. This would reduce impacts to water quality and other resources.

Analysis should consider the affects of road dust and increased traffic volume.

Existing roads should be used whenever possible and any new roads designed and placed to minimize impacts.

The number of roads should be reduced to avoid impacts.

The EIS should detail access plans to turbines during all seasons, particularly during the winter and evaluate the potential effects to wildlife from snow machine traffic.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

The EIS should evaluate long-term impacts from development of roads and transmission line networks to wildlife, particularly, induced growth of residential areas from subdivision of property.

Soil disturbance during construction and permanent roads could cause erosion.

Roads should be maintained to a high standard.

Temporary roads should be designed to disturb a minimum amount of surface area and reclaimed as soon as possible.

A Transportation Plan should be developed for the proposed project.

Concern about construction traffic in Rawlins, specifically the ability to make wide turns on narrow streets and blocking roads.

Concern that turbines located near I-80 would cause wind turbulence resulting in greater snow drifts to the highway.

Vegetation

The BLM should conduct surveys to determine the location and characteristics of native plant communities, and rare or special status species within the project area; the EIS document should establish standards for protection of these species.

Evaluate, mitigate, and develop a plan for managing invasive plant species as these plants have a detrimental effect on wildlife, native plants, and recreation.

The EIS should analyze the extent of the potential for invasive species, the causes, and options for both restoration and future prevention.

Preserve existing vegetation during clearing and grading to prevent water contamination during construction and operation, particularly near waterways.

If vegetation is burned during project operations, a smoke management program should be included in the EIS.

Concern expressed about unsuccessful restoration of disturbed areas and introduction and spread of noxious weeds.

Monitoring and eradication of noxious weeds should be implemented until the desired vegetation is established.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Visual Resources

The visual resource analysis should include consideration of impacts to the enjoyment of the scenic resource and whether the project would dominate the region or study area.

The proposed project will result in visual impacts, turning a wild landscape into an industrial setting.

The visual resource analysis should identify mitigation measures in the design and layout so the project blends in with the character of the area.

Would prefer the wind turbines be sited to avoid visual impacts from National Scenic Trails.

The visual resource analysis should consider whether the project will violate a standard intended to protect scenic and natural beauty from the community, county, region, and state level.

The EIS should consider impacts associated with airborne dust such as visual and public health and safety.

Suggests that the public be involved in providing input to the visual impacts of the project.

The evaluation of visual impacts should consider whether construction of the proposed project would significantly degrade scenic resources.

EIS should identify measures so that visual impacts are negligible.

Wind farms are permanent fixtures, as such, the siting of the turbines is critical to reduce impacts to the landscape.

Areas considered to be in the Foreground zone should be avoided to reduce visual impacts.

Concerned about project impacts to view sheds from the Rawlins Recreational Center.

Consideration should be given to scale back the project so that it is neither dense, nor as obtrusive to the Rawlins' view shed or phase the construction so that the view shed areas are impacted last.

EIS must consider visual resource values of public lands and be consistent with the BLM VRM policies and guidance.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Landscape treatments within the ROW and at other places that screen structures should be considered.

Concern about project effects to area homes resulting from alteration of view sheds.

Recommends that the BLM not pursue an amendment to the RMP that would allow for development of the project in a VRM Class III area. Instead siting and mitigation should be applied to the project to meet management objectives of VRM Class III.

The alternatives analysis must consider all reasonable alternatives that prevent visual impacts to VRM Class III areas.

Color and reflectivity of the facilities as mitigation for visual impacts should be considered in the EIS.

View shed to the Overland Trail should be adequately studied and thoroughly mitigated for any potential adverse impacts.

Impacts to open space view sheds, valued by the public, should be considered in the EIS.

The Continental Divide Trail Alliance recommends mapping of visual resources and the impact to these resources should be done in a manner consistent with the Scenery Management System to protect visual resources in the areas affected by the project.

The evaluation of visual impacts should include the proposed project and simulations from sensitive viewing areas.

The proposed project will adversely degrade the landscape and scenery, particularly views from Rawlins.

Water Resources

Notify WDEQ of spills or releases of chemicals and petroleum products; the EIS should restate this requirement and explain how soils, groundwater and surface water impacted from spills or leaks will be restored.

The U.S. Army Corps of Engineers should be contacted if the project requires work within waters of the US; a 404 permit may be required.

The project has the potential to exceed the turbidity criteria for waters designated as fisheries or drinking water supplies; therefore, a temporary turbidity variance may be required.

Conduct a comprehensive analysis on all waterways and drainages near or crossing roads and staging areas.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Depending on the eventual scope of the project, a storm water permit will be required through the WDEQ.

The EIS should clearly describe water bodies and groundwater resources within the area that may be impacted by project activities and the appropriate BMPs should be applied to reduce potential non-point sources of pollution.

The proposed project will increase impermeable areas which will result in increased runoff and more sediment to streams.

Concern that improvements to existing roads will reverse Clean Water Act Section 319 non-point source projects that have been funded in the Sage and Muddy Creek watersheds.

EPA suggests a mitigation commitment that indirect draining of, or direct disturbance of, wetland areas be avoided if at all possible, and complete avoidance of disturbance to any fen wetland (EO 11990).

Project alternative selected should be one where construction or any other activity does not impact waters of the U.S. (under Section 404 of the Clean Water Act (CWA)).

To prevent water contamination during construction and operation, use sediment barriers to trap soil in runoff where sheet flows occur.

An alternative should be considered to allow the cranes to move overland, reducing the need for road building and costly reclamation in an environment where reclamation is slow. This would reduce impacts to water quality and other resources.

The EIS should evaluate the use of County Road 347 south of Fort Steele for impacts to contamination of the North Platte River and fisheries.

The EIS should provide information on CWA Section 303(d) impaired waters, describe existing restoration efforts, how the project will coordinate with these efforts, and any mitigation measures that will be implemented to avoid further degradation.

All alternatives considered in the EIS should have detailed descriptions of preventive measures, reclamation plans and mitigation plans to protect water quality.

Disclose current inventory studies and conduct a full analysis of wildlife habitat, wildlife species, and current riparian and stream habitat conditions.

Note: Comments may be duplicated because the concern or issue may apply to multiple categories (e.g. biology and mitigation).

Conduct a complete and accurate assessment of the impacts to water, including reasonable, foreseeable impacts and baseline sampling of ground and surface water related to the proposed project.

Implement a monitoring system and action plan for detecting spills in the proposed project area to avoid adverse impacts to streams and water quality.

Sediment control should be emphasized for streams in close proximity to the Chokecherry portion of (Little Sage Creek, Sage Creek) the project area to reduce transport of sediment into the North Platte River.

Sediment should be controlled during construction in the Sierra Madre portion of the project to avoid sediment transport to the North Platte River, City of Rawlins Reservoir, and upstream Sage Creek to reduce impacts to sport fisheries.

All decisions to protect water quality in the EIS should data-based with a detailed discussion of BLM's monitoring strategies throughout the life of the project.

Bridges over perennial streams should be used during construction.

Provide current inventory studies and analysis of wildlife habitat and species as well as current riparian and stream habitat conditions.

Disturbance of soils during construction and permanent roads could cause erosion.

Reclamation of the road system should occur immediately following construction to minimize impacts to air and water quality.

Concern about water quality impacts should corrosive preventatives be used on the project and introduced into water runoff to surface waters.