
***Chokecherry and Sierra Madre Wind Energy Project
Environmental Assessment for Infrastructure
Components***

***Phase I Haul Road and Facilities,
West Sinclair Rail Facility, and Road Rock Quarry***

Appendix C

Comprehensive List of Scoping Comments

APPENDIX C. COMPREHENSIVE LIST OF SCOPING COMMENTS

Table C-1 identifies the scoping comments the Bureau of Land Management received on the Chokecherry and Sierra Madre Wind Energy Project infrastructure components environmental assessment.

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
001	1	We are specifically interested in the following analysis with respect to these facilities: Analysis of sites for the rail facility, haul road and road rock quarry that minimize the components’ impacts on fisheries, big game habitat, and sportsmen’s recreational experience on public lands. Ideally, this would include analysis of noise impacts and traffic impacts on fisheries, big game habitat, and areas of public land utilized by hunters and fisherman.	Recreation
002	1	We are specifically interested in the following analysis with respect to these facilities: Analysis of the components’ potential to contribute to soil erosion by wind and surface runoff, including analysis of soil types on the proposed locations and what mitigation measures will be applied to mitigate erosion and the resulting impacts on stream sedimentation and aquatic habitat.	Soil
003	1	We are specifically interested in the following analysis with respect to these facilities: Analysis of sites for the haul road, arterial roads and access roads that maximize avoidance of surface disturbance within 100 feet of ephemeral streams and 500 feet of perennial streams as outlined in Appendix D of the ROD.	Water
004	1	We are specifically interested in the following analysis with respect to these facilities: Analysis of impacts of any proposed stream crossings, timing of stream crossings, and application of appropriate mitigation measures that minimized impacts to the stream from sedimentation or otherwise.	Water
005	2	We understand that BLM at the highest level has recognized that standard practices in dealing with socioeconomic impacts have not been adequate and has put out new guidelines on how these should be dealt with to its field offices, in the form of directive IB 2013-100 Socioeconomic Strategic Plan. We suggest that additional socioeconomic information is needed so remote areas like UNPV can better understand potential impacts.	Socioeconomic
006	2	The issues we would like to see addressed are: anticipating where the workers may choose to live, factoring in the necessity of maintaining temporary housing for the workforce, and providing a wider range of possible housing scenarios that anticipate cumulative impacts. This approach must account for up-to-date information on factors like the Sinclair refinery and re-start of the Saratoga sawmill already taking up the “available” housing referenced in the Chokecherry/Sierra Madre EIS. This information needs to be provided on a community by community basis, not just for a general area of impact. Thus, each community has the information it needs to anticipate and prepare for the changes it will realize.	Socioeconomic
007	3	AHW has expressed our concerns about the proximity of the proposed haul road to a contributing segment of the Overland Trail that all present on the abovementioned field trip identified as exceptionally well preserved. However, unfortunately, the maps accompanying this scoping document fail to designate contributing segments of the Overland Trail. Moreover, the scale of the maps makes it impossible to even make an educated guess about the location of this important contributing segment.	Cultural

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Comment Number	Document ID	Comment	Category Title
008	3	The group discussed and made recommendations about the location of key observation points (KOPs) to monitor the condition of the historic trails as this project goes forward. We were also disappointed to see that these KOPs were not designated on the map. Had they been included, this might also have given us valuable information about the proposed location of the haul road.	Cultural
009	5	Although the surface water monitoring is important, it is also important that the actual surface disturbances are monitored so that any problems can be addressed before they create instream problems. The BLM Rawlins Field Office is requiring upland erosion BMP monitoring and reporting in the Atlantic Rim Natural Gas Project (IM No.WYD-03-2013-005). Because the potential erosion related impacts of the CCSM Project are similar, it should have the same type of erosion BMP monitoring and reporting requirements. This monitoring information will already be collected by PCW and should not result in any increased workload.	Water
010	5	Although the FEIS discusses that spills will be reported to appropriate agencies, the WQD would like to reiterate that Chapter 4 of the WDEQ Water Quality Rules and Regulations requires that the WQD be notified of spills or releases of chemicals and petroleum products. The EA should specifically reiterate this and explain how soils, groundwater and surface water impacted by spills, leaks and releases of chemicals, petroleum products and produced water will be restored.	Water
011	6	There is a wind generator in Canada that is more bird friendly than the large 3 block ones now having installed in the USA. This type generator needs to be considered.	Out of scope - wind turbines
012	7	The long term tax base impact for the benefit of Carbon County far outweighs the short term construction impact of people. In addition, it would appear that facilities for the shorter term construction will be utilized by several other projects over the course of time for a decade or longer!	Socioeconomic
013	13	My only concern is with water disposal. Fishing in the N. Platte is a big source of tourist income for Saratoga and Encampment. Though upstream, ground water pollution is an issue, and containment imperative!	Water
014	14	We recommend the BLM support and consider the findings of monitoring programs for sage-grouse, mule deer, raptors and other species as they develop site specific proposals for turbine placement throughout the Chokecherry/Sierra Madre proposal area defined in the EIS. We gladly extend our cooperation and input for further development of the upcoming environmental assessments.	Wildlife
015	15	BLM has promised that both an Avian Protection Plan (APP) and an Eagle Conservation Plan (ECP) will be required before CCSM is permitted to go forward. To date, however, neither of these Plans has been completed. Before BLM makes final decisions regarding pieces of CCSM, including the location of the haul road, we believe BLM must first determine whether the site truly can accommodate 1,000 wind turbines. We believe the agency cannot and should not do so without a complete understanding of how or whether the impacts to sage-grouse and eagles can be mitigated.	Wildlife - Greater Sage-Grouse

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016	15	The Rawlins Resource Management Plan (RMP) identifies much of the CCSM project area as being crucial yearlong habitat for mule deer. RMP FEIS at Map 2-54. The Chokecherry and Sierra Madre Wind Energy Project Final Environmental Impact Statement (CCSM FEIS) states that this area provides crucial habitats for elk, mule deer and pronghorn as well as important travel routes for big game seeking winter ranges or parturition areas outside the project area. In the CCSM FEIS, however, BLM admits that little is understood about the location and use of these big game migration corridors. Still, the site of the haul road identified in the Preferred Alternative (Alternative 1 R) of the CCSM FEIS cuts in half a known mule deer migration route. Before permitting this road, BLM must collect sufficient data regarding big game use of the project area and their migration through the area in order to determine whether the proposed location for the haul road is appropriate. NWF and WWF urge BLM to explore alternative locations for this road.	Wildlife
017	15	We believe that many of the potential impacts of CCSM have not yet been fully analyzed. The construction and operation of 1,000 turbines, ancillary facilities and almost 500 miles of roads on lands currently occupied by Greater sage-grouse, raptors, mountain plovers, and mule deer will come at a cost to wildlife habitat and populations. The only real question is how severe the cost will be and whether effective actions can be taken to reduce wildlife impacts. Unfortunately, an honest discussion of the true nature of that cost is not included in the CCSM FEIS. The FEIS glosses over the potential for harm with vague promises of mitigation resulting from as yet to be developed wildlife protection plans and suggestions that BLM may require additional mitigation measures if some undisclosed level of impact occurs.	Wildlife
018	15	NWF and WWF continue to be concerned about the cumulative impacts of CCSM and other development in the area. Because of the proximity of CCSM to the Atlantic Rim Natural Gas Project as well as the proposed Continental Divide-Creston Natural Gas Development Project (CD-C Project) and the fact that many animal species use the entire landscape surrounding these projects throughout the course of a year, the impacts of the projects will combine to create biologically significant and potentially devastating effects on resident wildlife populations. Where gas development and wind development are not compatible with wildlife habitat, avoidance of energy development will reduce the distribution of certain wildlife species and will result in population declines if density-dependence, competition, or displacement into poor-quality habitats lowers survival or reproduction among displaced wildlife. Although the CCSM FEIS documents the Atlantic Rim energy play, for example, it does not address how BLM will handle the cumulative impacts of these two energy productions on wildlife, habitat and recreation. The CCSM FEIS does not discuss potential CD-C Project impacts.	Wildlife - Cumulative Impacts
019	15	The cumulative impact of the Trans West Express Transmission Project and CCSM as connected activities must be addressed.	Wildlife - Cumulative Impacts

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Comment Number	Document ID	Comment	Category Title
020	15	At a minimum, BLM must seek to "conserve" sensitive species that occur in the CCSM area in a manner which contributes to their removal from BLM's sensitive species list. The requirement established by BLM Manual MS-6840.06.E (Special Status Species Management) is not only to prevent threats to the continued existence of these species or their listing under the ESA but also to remove them from the BLM sensitive species list. This is an affirmative obligation established by the BLM manual. BLM must put in place specific habitat and population management objectives designed to remove these species from the special status species list. BLM must also ensure that activities that affect sensitive species are done in a manner that is consistent with their conservation.	Wildlife - Cumulative Impacts
021	15	The Record of Decision for the Chokecherry and Sierra Madre Wind Energy Project and Approved Visual Resource Management Plan Amendment (ROD) proudly states that CCSM's proponent, Power Company of Wyoming (PCW) has committed to avoid siting wind turbines within Wyoming's sage-grouse core areas. ROD Appendix C, Table C-2. However, CCSM, as currently configured, intrudes on outstanding sage-grouse habitat that was gerrymandered out of lands classified as key Wyoming sage-grouse cores areas specifically so this project could be built.2 BLM should ensure that its approval of CCSM does not degrade or destroy this habitat. This would be contrary to its sensitive species manual, the Wind Energy programmatic Final Environmental Impact Statement, and the original Wyoming Executive Order and could lead to listing under ESA.	Wildlife - Greater Sage-Grouse
022	15	We continue to encourage the project proponent and BLM to consider using Highway 71 as the haul road. Although using Highway 71 will increase traffic on a road popular to recreationists, it will minimize disturbance to mule deer winter range that already is in reduced condition in the Platte Valley according to the Platte Valley Habitat Partnership. While it is true that current Wyoming Game and Fish Department (WGFD) regulations do not consider summer range as a limiting factor for big game, BLM should review recent research by Tollefson et al. (2010) in order to implement proactive management. In fact, the Platte Valley Habitat Partnership and WGFD are using this idea as a basis for restoration of habitat improvements within the Platte Valley. We continue to urge less development of the Sierra Madre portion of the project because of its high percentage of use in the spring/summer/fall by big game.	Wildlife
023	15	WWF and NWF continue to recommend removing Miller Hill from development because of its importance to both big game and hunting opportunities.	Wildlife
024	15	This project is proceeding when assessments of threats to birds are at best incomplete and in some cases deferred until a later time. BLM is flying blind, unable to accurately assess the magnitude of impacts, plan mitigation measures that might compensate in some way for these impacts, and then evaluate the efficacy of these mitigation measures, as required by NEPA. We urge the agency to address these deficiencies before it makes additional commitments to CCSM.	NEPA
025	16	Carbon County is concerned about the industrial use of Carbon County Road 407 and the probability of significant road damage. The applicant will be required to provide a pre-construction base line survey to determine existing road conditions. Any degradation to or damage to the County Road will require the applicant to bear-all costs required to return the road to the original or better condition.	Travel and Transportation Management

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026	16	Carbon County is concerned about the potential for significant degradation of air quality due to wind-blown dust. Grading and construction of the haul roads and facilities, the West Sinclair Rail Facility and the Road Rock Quarry will result in a significant amount of disturbed soil and the potential for degradation of air quality. An aggressive dust control program must be implemented to maintain the existing air quality.	Air Resources
027	16	In addition to the application of water to control dust, a dust palliative should be used on the heavily used haul roads to avoid a dust problem rather than mitigation after the fact. The use of a magnesium chloride or similar dust palliative on the heavily used roadways will also minimize the depletion of ground and surface water resources.	Air Resources
028	16	Carbon County is concerned that the influx of non-resident workers will disrupt the local housing market. This is a growing concern when considering cumulative impacts due to the multiple energy related construction projects pending. Energy workers often reserve hotel and motel rooms for longer stays which contribute to the loss of available short term accommodations for the tourism and recreation industry. Further analyses should be completed to assess the timing and need for temporary housing facilities and the use of hotel and motel rooms for longer stays and how the longer stays change the lodging tax revenue.	Socioeconomic
029	16	Carbon County is concerned with the timely reclamation of disturbed soil and weed control Implementation of the Weed Control Plan should include control and eradication of a broad range of weeds and not be limited to noxious and invasive species. Weed control should be maintained as directed by the Carbon County Weed & Pest Control Board or other public entity having jurisdiction.	Vegetation
030	19	I have concerns for the cumulative effect of all proposed projects will have on available water sheds, aquifers. Not just the beginning of the Choke Cherry infrastructure.... that I should only be comment on but water that will be needed during the same period of time for all the other water intensive projects in the area.	Water
031	21	Roads and disturbed areas adjacent to the roads provide avenues for invasive and noxious weeds to spread to areas previously not found. It is important to reclaim areas that have been disturbed and to control invasive weeds otherwise. The EA must provide detailed requirements for reclamation methods to address continued invasive plant controls.	Vegetation
032	21	Other users of the public and private lands within and near the CCSM project must not be denied access to lands where those users hold permits or valid existing rights. Livestock grazing is one such use that exists throughout the CCSM area. The EA must address how the CCSM project will be constructed, including the West Sinclair rail facility, the road rock quarry, and the roads, while still permitting other uses.	Range Resources
033	21	LSRCD supports allowing public use of the Haul Road and the other roads. This will mitigate impacts, especially in the spread of invasive and noxious weeds, by allowing everyone to use the same roads, rather than each creating their own routes.	Travel and Transportation Management

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034	21	For the most part, the CCSM project avoid sage-grouse core habitat areas, but the EA must address methods to mitigate impacts on sage grouse, especially considering the fact that road construction, habitat fragmentation, and the spread of invasive and noxious weeds along roadways are recognized by USFWS as major threats to sage-grouse viability. Sage-grouse core habitat areas surround the CCSM project and sage grouse likely use the CCSM project area as well. BLM, CCSM Wind Energy Project: Greater Sage Grouse Map, available at http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/Chokecherry/pub-mtg-docs.html . Methods must include predator/raptor controls on any facilities constructed during the infrastructure component of the CCSM project, immediate reclamation and site stabilization of disturbed surface areas, whether temporary or final, and additional control measures for invasive and noxious weeds.	Wildlife - Greater Sage-Grouse
035	15	BLM, working jointly with USFS, is preparing EISs to address the effects of implementing Greater sage-grouse conservation measures on the lands they manage. The draft EIS covering the Rawlins Resource Area, however, has not yet been released for public comment. We urge BLM to complete this sage-grouse EIS before making additional commitments to permit CCSM.	Wildlife - Greater Sage-Grouse
036	5	We request the BLM build on the lessons learned from other projects with large amounts of surface disturbance to ensure erosion is controlled at the source, before there is any increased sediment loading to the ephemeral, intermittent and perennial streams in the project area.	Water