The logo for SWCA (Soil Water Conservation Agency) is positioned vertically on the left side of the page. It consists of the letters 'S', 'W', 'C', and 'A' in a large, stylized, light blue font. The letters are stacked vertically, with the 'S' at the bottom and the 'A' at the top. The background of the entire page is a solid blue color.

Lava Ridge Wind Project Environmental Impact Statement Final Scoping Report

DECEMBER 2021

PREPARED FOR

Bureau of Land Management

PREPARED BY

SWCA Environmental Consultants

**LAVA RIDGE WIND PROJECT
ENVIRONMENTAL IMPACT STATEMENT

FINAL SCOPING REPORT**

Prepared for

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December 2021

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1 INTRODUCTION

1.1 Background

Magic Valley Energy, LLC (MVE), is seeking authorization to use federal lands to construct, operate, maintain, and at the end of this project's life, decommission the Lava Ridge Wind Project (project). The project would comprise a wind energy generating facility and ancillary facilities located primarily on public lands administered by the Bureau of Land Management (BLM) Shoshone Field Office (SFO) in Jerome, Lincoln, and Minidoka Counties, approximately 25 miles northeast of Twin Falls, Idaho (Figures 1 and 2). The project would consist of up to 400 wind turbines and associated infrastructure and a 500-kilovolt (kV) generation intertie transmission line that would interconnect at Idaho Power's existing Midpoint Substation or at a new substation along the permitted northern portion of the Southwest Intertie Project (SWIP) 500-kV transmission line (SWIP-North). MVE has proposed to locate all components of the project within a series of siting corridors covering approximately 76,000 acres. Additional project details are available in the scoping handout (BLM 2021) and preliminary plan of development (POD) (MVE 2021).

The BLM SFO is responsible for managing public land in its management area in accordance with the Federal Land Policy and Management Act (FLPMA) (1976) and in conformance with the BLM SFO's 1986 *Monument Resource Management Plan* (BLM 1986). In accordance with FLPMA, public lands are to be managed for multiple uses in a manner that uses the lands in a combination that would best meet the present and future needs of the people. The BLM is authorized to grant a right-of-way (ROW) on public lands for facilities that are in the public interest and that require a ROW over, upon, under, or through such lands (FLPMA Section 501(a)(7)). In February 2020, the BLM SFO received an application for a ROW from MVE along with a preliminary POD. MVE revised the project POD and resubmitted it to the BLM in June 2021 (MVE 2021).

1.2 Purpose and Need

The BLM's purpose and need for the project are established by regulatory obligations and directives and current energy development trends. The BLM's purpose is to respond to the ROW application submitted by MVE in compliance with FLPMA, BLM ROW regulations, and other applicable federal laws and policies. The need for the BLM's Proposed Action arises from FLPMA, which establishes a multiple use mandate for management of federal lands, including "systems for generation, transmission, and distribution of electric energy" (FLMPA Title V). The BLM's action in considering MVE's ROW application is provided under the authority of the Secretary of the Interior to "grant, issue, or renew rights of way . . . for generation, transmission, and distribution of electric energy" (43 Code of Federal Regulations [CFR] 2800). The purpose of and need for the project are used to formulate a reasonable range of alternatives to be considered in the environmental impact statement (EIS) so that the BLM can take the requisite "hard look" at the potential effects of the Proposed Action and make an informed decision regarding the project.

MVE's goal for the project is to produce renewable energy reliably and economically with wind turbine generators for delivery to power markets in the western United States, including those markets accessed via interconnection to the existing Midpoint Substation or to an alternative new substation constructed

along the permitted, but not-yet-constructed, SWIP-North. MVE's objectives of construction and operation of the project are to

- provide a new economic and reliable renewable energy source;
- be able to serve multiple power markets in the western United States, including those accessible through use of the SWIP transmission corridor;
- provide economic benefits to the State of Idaho and the local Counties of Jerome, Lincoln, and Minidoka, including the creation of new jobs;
- contribute to the achievement of local and state renewable energy and carbon reduction goals; and
- maximize the potential extraction of wind energy to make the resource economically attractive to customers while balancing environmental sensitivities.

MVE's goal for the project arises from regulatory, utility, and consumer-driven objectives to incorporate increasing amounts of renewable and carbon-free energy sources into energy supply portfolios. Substantial amounts of new renewable energy resources are required to meet this need. Most states in the western United States have specific renewable energy goals. See Section 1.2 of the POD for detailed discussion of this issue.

1.3 Decision to be Made

The BLM will decide whether to grant, grant with conditions, or deny the application for this ROW. Pursuant to 43 CFR 2805.10, if the BLM issues a grant, the BLM decision maker may include terms, conditions, and stipulations determined to be in the public interest. The decision may be an alternative, or a combination of parts of the alternatives.

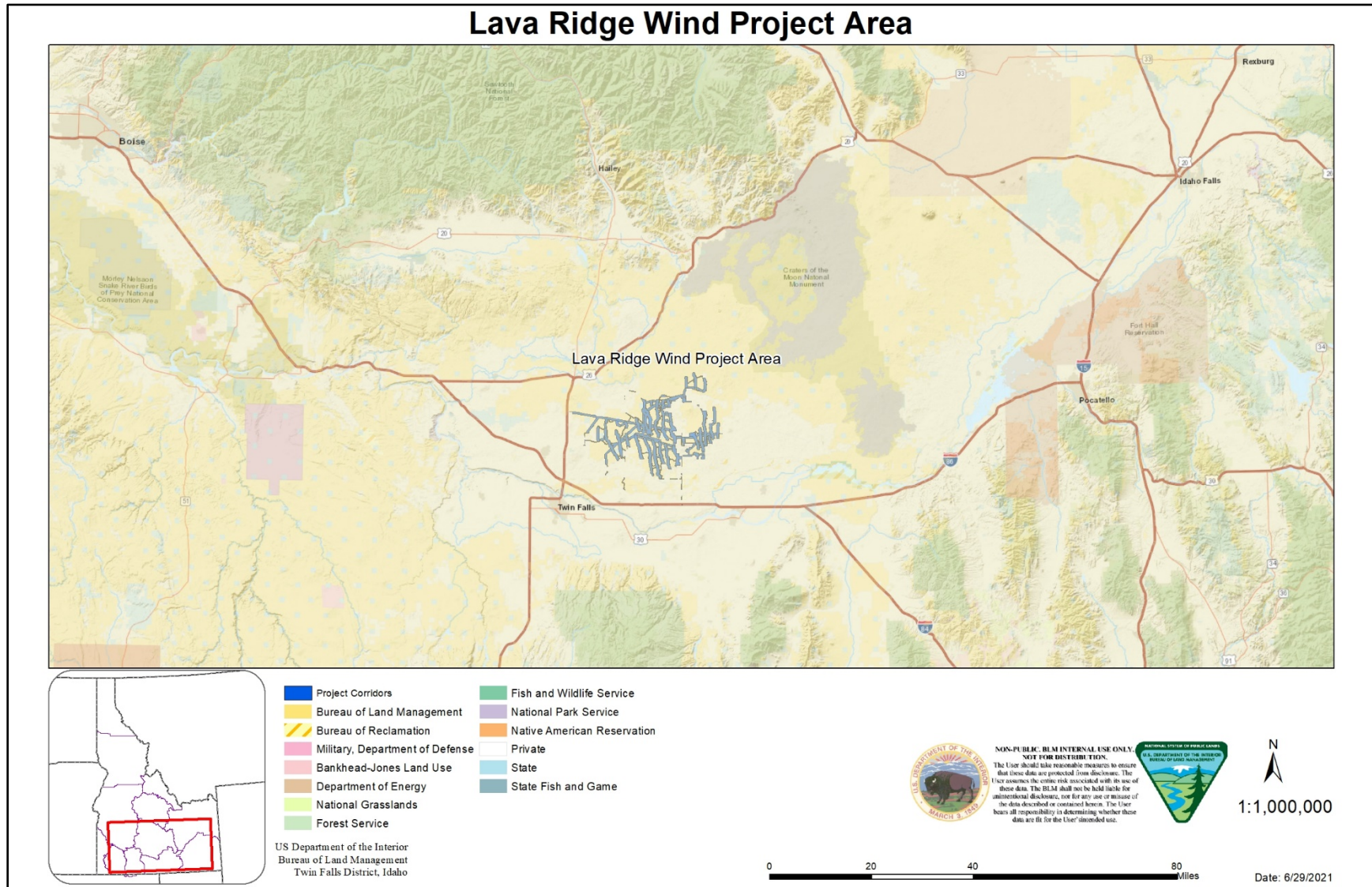


Figure 1. Lava Ridge Wind Project location.

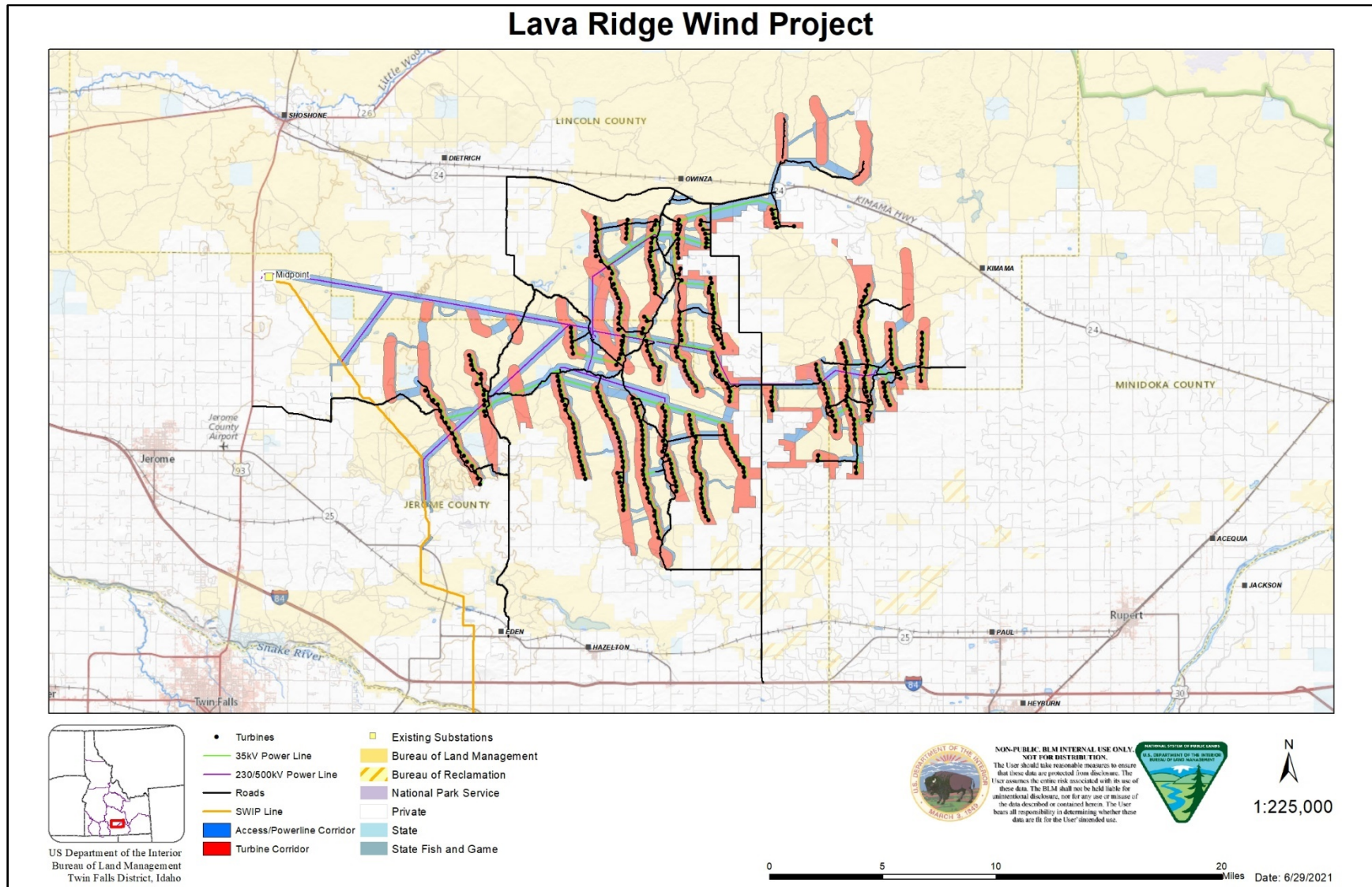


Figure 2. Lava Ridge Wind Project Proposed Action siting corridors.

2 SCOPING PROCESS

The BLM follows the public involvement requirements documented in the Council on Environmental Quality National Environmental Policy Act (NEPA)—implementing regulations (40 CFR 1501.9 for scoping and 40 CFR 1506.6 for public involvement). The BLM also follows the public involvement requirements described in the BLM’s NEPA Handbook H-1790-1 (BLM 2008).

The purpose of scoping is to provide an opportunity for members of the public to learn about the Proposed Action and to share any relevant or site-specific concerns or comments they may have. Input from the public scoping process is used to help the BLM identify issues, concerns, and potential alternatives to be considered in the EIS. In addition, the scoping process helps identify any issues that may not require detailed analysis in the EIS. The list of stakeholders and other interested parties may also be updated and expanded during the scoping process.

The public scoping process for the project was initiated by publishing a Notice of Intent to prepare an EIS (Appendix A) in the *Federal Register* on August 20, 2021. Originally, the 30-day period for submitting scoping comments was from August 20, 2021, to September 20, 2021. However, in response to feedback received during the public scoping period, the BLM extended the official comment period by 30 days, ending on October 20, 2021, in order to be more inclusive of the interested parties. Notification of the comment period extension was accomplished through distribution of a press release, 470 direct mail letters, and 518 email notices. Although the official scoping period ended on October 20, 2021, the BLM will continue to accept comments throughout the NEPA process.

2.1 Objectives

Scoping is the first step and an integral part of the NEPA process. It is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the Proposed Action (40 CFR 1501.9). The objectives of the scoping process are to:

- increase public awareness and understanding of public lands stewardship through meaningful and productive constituent and local stakeholder involvement;
- engage federal, state, local, and Tribal governments and the public in the early identification of concerns, potential impacts, and possible alternative actions;
- determine the scope and potentially significant issues to be analyzed in depth in the NEPA process;
- identify and eliminate issues that are not significant or that have been covered by prior environmental review;
- identify the scope of issues to be addressed and integrate analyses required by other environmental laws (e.g., Endangered Species Act [ESA], National Historic Preservation Act); and
- identify technical studies needed to adequately address the potential impacts of the project.

2.2 Advertising of Public Meetings

Pursuant to NEPA requirements, the scoping meetings were advertised in a variety of formats beginning at least 2 weeks prior to their scheduled dates (Table 1). In each format, the advertisements provided logistics, explained the purpose of the public meetings, explained how to give substantive comments,

gave the schedule for the (scoping) public comment period, outlined additional ways to comment, and provided methods for obtaining additional information (Appendix B). Letters were mailed to 355 organization addresses, 79 individuals, and 25 Tribal representatives. Email notices were sent to 203 and 200 recipients on August 23 and September 3, 2021, respectively.

Table 1. Meeting Notification Methods and Dates

Publicity Item	Venue and Date
Notice of intent	<i>Federal Register</i> Volume 86 Number 159, pages 46867–46870 (August 20, 2021)
Proposed Action scoping mailing (see Appendix A)	BLM stakeholder list (August 23, 2021)
Paid display advertisement (see Appendix B)	<i>Twin Falls Times-News</i> (August 26 and September 7, 2021)
Email notices	Sent by <i>Galileo Project LLC</i> on behalf of the BLM (August 23 and September 3, 2021)
BLM project website	https://go.usa.gov/xFKxg

2.3 Public Scoping Meetings

The BLM hosted two public meetings in September 2021 (Table 2). Because of the ongoing health and safety concerns surrounding the COVID-19 pandemic, both meetings were held virtually using the Zoom Webinar platform. The meetings began with a pre-recorded presentation in which the BLM project team provided a brief description of the project. Attendees were encouraged to use the question and answer (Q&A) feature in the webinar to submit questions for BLM and MVE response following the presentation. Questions continued to be accepted during the Q&A sessions following the presentation. Prior to the public meetings, a document with project information presented in poster format was uploaded to the BLM project website. These provided information about the following:

- Purpose and need of the Proposed Action
- Cooperating agencies
- Project description
- NEPA and the EIS process
- Visual resources
- Cultural resources and Section 106 of the National Historic Preservation Act
- Wildfire management
- Wildlife, including bats, migratory birds, and species protected under the ESA
- Livestock grazing
- How to provide comments
- Project map showing the siting corridors

A copy of the PowerPoint presented during the meetings and the information posters are included in Appendix C. A list of attendees at each of the public scoping meetings and the questions that were submitted using the Q&A feature during each meeting are also provided in Appendix C.

Table 2. Public Scoping Meeting Dates, Locations, and Attendance

Meeting Location	Meeting Date	Time of Meeting	Number of Attendees
Virtual (Zoom Webinar)	September 8, 2021	2:00 p.m.–3:00 p.m.	103
Virtual (Zoom Webinar)	September 9, 2021	6:00 p.m.–7:00 p.m.	87

2.4 Opportunities for Public Comment

Members of the public were afforded several methods for providing comments during the scoping period:

- Comments could be submitted directly from the BLM project website:
<https://go.usa.gov/xFKXg>
- Emailed comments could be sent to a dedicated email address:
BLM_ID_LavaRidge@blm.gov
- Individual letters could be hand delivered or mailed via U.S. Postal Service or private carrier to the following:
Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street
Shoshone, Idaho 83352

All comments were given equal consideration, regardless of transmittal method.

2.5 Agency Coordination

The BLM has contacted key federal, state, county, and local agencies, as well as Native American Tribes, to initiate coordination throughout the NEPA process. Table 3 lists the agencies and Native American Tribes that the BLM has contacted as of the date of this report.

Table 3. Agencies Contacted to Initiate Coordination

Type	Name
Federal	National Park Service*
	National Renewable Energy Laboratory
	U.S. Army Corps of Engineers*
	U.S. Environmental Protection Agency
	U.S. Fish and Wildlife Service*
	Federal Aviation Administration

Type	Name
State	Idaho Department of Fish and Game*
	Idaho Office of Species Conservation*
	Idaho State Department of Agriculture*
	Idaho Department of Environmental Quality*
	Idaho Office of Energy and Mineral Resources*
	Idaho Department of Lands*
	Idaho Transportation Department
	Idaho Department of Water Resources
	Idaho State Historical Society*
Local	Jerome County*
	Lincoln County*
	Minidoka County*
	City Hazelton
	City of Richfield
	City of Dietrich
	City of Eden
	City of Jerome
Tribal	Battle Mountain Band
	Confederated Tribes of the Goshute Reservation
	Elko Band
	Nez Perce Tribe
	Northwestern Band of the Shoshone Nation†
	Shoshone-Paiute Tribes†
	Shoshone-Bannock Tribes†
	South Fork Band
	Te-Moak Tribe of Western Shoshone
	Wells Band

* Cooperating agencies.

† Invited for government-to-government consultation.

2.6 Tribal Consultation

The BLM invited the Shoshone-Bannock Tribes, Shoshone-Paiute Tribes, and the Northwestern Band of the Shoshone Nation to engage in government-to-government consultation regarding the project. Formal consultation has begun with the Shoshone-Paiute Tribes and the Shoshone-Bannock Tribes. The formal Tribal consultation process will continue throughout the NEPA analysis, and a summary of this process will be included in the EIS.

3 SCOPING COMMENT ANALYSIS

Four phases in the comment analysis process were used to analyze comments received during public scoping: 1) develop an issue coding structure, 2) import and organize all submittal content in a comment database, 3) carefully read each submittal and assigning codes to comments, and 4) prepare this narrative report of those analysis results. It is important to note that the comment analysis process is not and should not be considered a vote. Every effort was made to qualify the intensity of the public's expressions, and all comments were treated equally and were not weighted by number, organizational affiliation, "status" of the commenter, or other factors. Emphasis was on the content of a comment, rather than on who wrote it or the number of submitters who agreed with it.

3.1 Development of the Coding Structure

The first phase of the analysis process was to develop a coding structure to help sort comments into logical categories and subcategories by issue category or process category, specifically resources and planning processes applicable to the project. The issue coding structure was derived from an analysis of the range of issues uncovered during background research and internal scoping and evolved as submittals were read and comments were identified. The use of these codes in the database allows for quick access to comments on specific topics. Table 6 in Section 4.2 shows the issue and process categories that were determined to be most inclusive of the substantive comments received during public scoping and their corresponding codes.

3.2 Database Analysis

The second phase of the analysis process involved creating submittal records in a comments database for every submittal received. Comments submitted through the BLM project website and email were entered into the database automatically and then reviewed to ensure all comment text and commenter information were correctly captured. The commenter information and comment text for hand-delivered and mailed letters were entered into the database manually. Each submittal was recorded in the database where it was assigned a unique number and was then labeled with a commenter type code that indicated the entity from which it was received (i.e., 'I' for individual, 'G' for government agency, 'O' for organization). Submittals that included only a person's name and any address information were coded as having been received from an individual. If an affiliation with a business, government (federal, state, local, or Tribe), or organization was included in the commenter information of a submittal, the submittal record was assigned to the corresponding commenter type category. The submittal mode was also identified (e.g., email).

3.3 Identification and Coding of Comments

Once submittals were coded for commenter and submittal types, each submittal was read carefully to identify preliminary issues that will be addressed during the NEPA process. Each individual statement identified as a comment was assigned a category. Each comment was then further described using a specific descriptive numeric code, as illustrated in Table 6 in Section 4.2. Each submittal may include multiple coded comments. This form of analysis allows for specific comments to be captured and then grouped under the umbrella of a general issue or process concern. It also allows for cross-referencing and comparison. Although individual comments may present concerns with multiple issues, a single category reflecting the primary concern was assigned. The primary purpose of comment coding is to organize comments by resource to facilitate review by resources specialists on the BLM interdisciplinary team (ID Team) and *is not* to estimate the volume of comments received regarding a particular resource.

3.4 Preparation of Scoping Report

The final phase included identifying statements of public concern and preparing this narrative report. The statements of concern are a compilation of comments received from the public and various agencies during public scoping. The intent of this compilation is to provide representative statements that capture, with minimal repetition, all major concerns expressed during the public comment period. The statements are not necessarily verbatim iterations of comments received but in many cases include similar or exact phrasing.

4 SUMMARY OF PUBLIC SCOPING COMMENTS

4.1 Submittals Received

In total, 1,478 submittals were collected during public scoping, 44 of which were identified as duplicate submittals. Table 4 lists the types of submittals received and their corresponding comment totals and percentages.

Table 4. Distribution of Comments by Submittal Type

Submittal Type	Submittal Total	Percentage of Total (submittals)
BLM website	125	8%
Email	1,325	90%
Letter	28	2%
Total	1,478	100%

Table 5 lists the number of submittals and comments by submitter type (individual, government, or organization). It also lists the agencies and organizations that submitted comments.

Table 5. Agencies and Organizations that Submitted Scoping Comments

Submitter Type	Name	Submittal Count
Individual	Individual names are not included to protect commenter privacy.	1,405
Government	Dietrich School District #134	16
	Idaho Military Division	
	Idaho Office of Energy and Mineral Resources	
	Idaho Office of Species Conservation	
	Idaho Department of Fish and Game	
	Idaho Department of Agriculture	
	Idaho Department of Parks and Recreation	
	Idaho State Historic Preservation Office	
	Idaho Transportation Department	
	The Shoshone-Bannock Tribes, Fort Hall Business Council	
	Southern Idaho Regional Communication Center (SIRCOMM)	
	National Park Service	
	U.S. Environmental Protection Agency Region 10	

Submitter Type	Name	Submittal Count
Organization	American Bird Conservancy	57
	Audubon Rockies	
	Bainbridge Island Japanese American Community	
	Bainbridge Island Japanese American Exclusion Memorial Association	
	Blue Ribbon Coalition	
	Coalition to Protect America's National Parks	
	Colorado Preservation, Inc.	
	Florin Japanese American Citizens League	
	Friends of Minidoka	
	Hidden Valley Organic	
	High Desert Pointing Dog Club	
	Idaho Chapter of Safari Club International	
	Idaho Conservation League	
	Idaho Falls Japanese American Citizens League	
	Idaho Heritage Trust	
	Idaho Recreation Council	
	Idaho State Bowhunters	
	Idaho Wildlife Federation	
	Japanese American Citizens League, Seattle Chapter	
	Japanese American Confinement Sites Consortium	
	Japanese American Museum of Oregon	
	Japanese Cultural and Community Center of Washington	
	Magic Valley ATV Riders	
	Minidoka Pilgrimage Planning Committee	
	National Audubon Society	
	National Parks Conservation Association	
	National Trust for Historic Preservation	
	The Nature Conservancy	
	Oneida Farms, Inc.	
	Oregon Physicians for Social Responsibility	
	The Manzanar Committee	
	Prairie Falcon Audubon Society	
	Portland Japanese American Citizens League	
	Prescott Land and Livestock	
	Project Mutual Telephone, Inc.	
	Sid Butte Livestock Association	
	Theodore Roosevelt Conservation Partnership	
	Tule Lake Committee	
	Twin Falls County Historic Preservation Commission	
	Venice Japanese American Memorial Monument Committee	
	Western Watersheds Project	
	Wing Luke Museum	
Total		1,478

Two different form letters were identified, accounting for 953 of the 1,478 submissions, or approximately 64%. One form letter was submitted by 36 individuals and primarily raised concerns related to public access and outdoor recreation opportunities that may be affected by the project. The other form letter, submitted by 917 individuals, expressed concerns related to National Park Service (NPS) properties near the project, including Craters of the Moon National Monument and Preserve and the Minidoka National Historic Site.

4.2 Comments Identified

In total, 1,157 unique comments were identified in the submittals received during public scoping (Appendix D). Table 6 shows the distribution of unique comments received by their issue or process category and code. This coding structure was developed before comments were received. Therefore, not all codes have corresponding comments from the public scoping period. However, because the codes could have corresponding comments for the draft EIS public comment period, all codes are being retained. Although submitted by many individuals, unique comments in form letters are only counted once for the purposes of this table.

Table 6. Distribution of Public Scoping Comments by Issue or Process Category

Code	Issue Category or Process Category	Comment Count
AIR	Air Quality	
01	General air quality	4
02	Fugitive dust	1
03	Climate change/greenhouse gases	5
<i>Subtotal</i>		<i>10</i>
ALT	Alternatives	
01	General deficiency/inadequate range of alternatives	15
02	Suggested new alternative	33
03	Suggested modification to existing alternative	5
<i>Subtotal</i>		<i>53</i>
ATTN	Attention/Action Needed	
01	Threat of harm	0
02	Notice of appeal or litigation	6
03	Request for cooperating agency status	0
04	Request to be added to mailing list	5
05	Freedom of Information Act request	1
06	Requires agency response	5
07	Request meeting with agency	1
08	Flag for project management team review	0
09	Request for government-to-government consultation	0
<i>Subtotal</i>		<i>18</i>

Code	Issue Category or Process Category	Comment Count
CUL	Cultural Resources and Native American Concerns	
01	General cultural resources	29
02	General Native American concerns	4
03	Native American traditional uses	1
04	Japanese American concerns	48
<i>Subtotal</i>		82
DATA	Analysis Methods and Data	
01	General analysis methods and data	10
02	Inadequate analysis/inaccurate data	4
03	Suggest additional data source	4
04	Cumulative effects analysis	9
<i>Subtotal</i>		27
DECI	Decision Process	
01	General decision process	5
02	Issues not considered in detail	0
03	BLM resource management plans	8
04	National Park Service	5
05	Section 106 consultation	15
06	Section 7 consultation	2
07	Other agency consultation and coordination	1
08	Relationship to policies, plans, and programs	14
09	Agency planning regulations or federal laws	8
10	USACE clean water act	0
11	State or local permits	2
<i>Subtotal</i>		60
DF	Design Features	
01	General design features	8
<i>Subtotal</i>		8
EDIT	Editorial	
01	General editorial	2
<i>Subtotal</i>		2
FIRE	Fire and Fuels Management	
01	General fire and fuels management	13
<i>Subtotal</i>		13
FLGT	Flight Travel	
01	General flight travel	4
<i>Subtotal</i>		4
GRAZ	Livestock Grazing	
01	General livestock grazing	38
<i>Subtotal</i>		38

Code	Issue Category or Process Category	Comment Count
HAZ	Hazardous Materials and Solid Waste	
01	General hazardous materials and solid waste	7
<i>Subtotal</i>		7
HHS	Human Health and Safety	
01	General human health and safety	6
<i>Subtotal</i>		6
LAND	Lands and Realty	
01	General lands and realty	7
02	Minerals	2
<i>Subtotal</i>		9
NOI	Noise	
01	General noise	14
<i>Subtotal</i>		14
NPS	National Parks	
01	General national parks	10
02	Craters of the Moon National Monument and Preserve	4
03	Minidoka National Historic Site	245
<i>Subtotal</i>		259
OOS	Out of Scope	
01	General out of scope	10
02	Other projects	4
<i>Subtotal</i>		14
OPP	Oppose	
01	General opposition	100
<i>Subtotal</i>		100
P&N	Purpose and Need	
01	Agency's purpose and need	2
02	Applicant's purpose and need	2
<i>Subtotal</i>		4
PALE	Paleontology	
01	General paleontology	1
<i>Subtotal</i>		1
PROJ	Project Description	
01	General project description	23
02	Materials/supply chain	9
<i>Subtotal</i>		32
PUBL	Public and Stakeholder Involvement	
01	General public and stakeholder involvement	4
02	Comment period/public meetings	4
03	Public outreach/availability of information	17

Code	Issue Category or Process Category	Comment Count
04	Tribal coordination	5
05	Cooperating agencies	0
06	Scoping	3
<i>Subtotal</i>		33
REC	Recreation	
01	General recreation	18
02	Special Recreation Management Areas, Recreation Management Zones, Extensive Recreation Management Areas	0
03	Hunting and fishing	7
<i>Subtotal</i>		25
SOC	Environmental Justice and Socioeconomics	
01	General socioeconomics	46
02	Private property	1
03	Environmental justice	9
04	Employment	15
05	Housing	4
06	Taxes/revenue	9
<i>Subtotal</i>		84
SOIL	Soils and Geology	
01	General soils and geology	8
<i>Subtotal</i>		8
SUP	Support	
01	General support	19
<i>Subtotal</i>		19
SSW	Special-Status Wildlife	
01	General special-status wildlife	6
02	Threatened and endangered species	3
03	BLM special-status species	1
04	Greater sage-grouse	18
05	Eagles	3
<i>Subtotal</i>		31
TRAN	Transportation	
01	General transportation	7
02	Traffic volume/congestion	1
03	Road maintenance	7
04	Traffic safety	0
05	BLM travel and transportation management	0
<i>Subtotal</i>		15

Code	Issue Category or Process Category	Comment Count
VEG	Vegetation Communities (including Noxious Weeds and Invasive Species)	
01	General vegetation communities	11
<i>Subtotal</i>		11
VIS	Visual Resources	
01	General visual resources	37
02	Night sky/dark sky	10
03	Shadow flicker	0
<i>Subtotal</i>		47
WATER	Water Resources	
01	General water resources	11
02	Waters of the United States	1
03	Groundwater	17
<i>Subtotal</i>		29
WILD	General Wildlife	
01	General wildlife	43
02	Big game	20
03	Migratory birds (including raptors) and bats	31
<i>Subtotal</i>		94
Total		1,157

4.3 Theme and Concern Summary

Individual comments were assigned to one of 32 categories (see Table 6) on the basis of the overall theme and concern of the comment. Individual submittals typically contain several distinct comments; although every effort was made to split each submittal so that each comment pertained to a single resource, this was often not possible due to the interrelated nature of many resources. For example, many of the comments were coded to NPS-03 because the overall concern raised in the comment was impacts to the Minidoka National Historic Site. However, a large number of these comments also mentioned environmental justice concerns (SOC-03) or visual impacts (VIS-01). The comment counts in Table 6 also only count form letter comments once, regardless of the number of individuals who submitted that form letter. Therefore, the comment counts provided in Table 6 are not intended to provide a quantitative assessment of the volume of comments received relative to individual resources but do provide some indication of which resources were of primary concern in the public scoping comments. For example, 245 of the 1,157 unique comments (or 21%) were primarily concerned with impacts to the Minidoka National Historic Site, regardless of whether those impacts were related to environmental justice, visual resources, or another issue. Livestock grazing is another example of a resource category that received comments that overlapped other resources, such as how the loss of range improvements like stock tanks or water troughs would impact the availability of water for wildlife, or how the impacts to existing grazing operations would affect the local economy. Therefore, rather than organizing the summary of scoping comments in this report by the resource code they were assigned, the issues and concerns raised in the scoping comments are discussed in terms of the preliminary issue statements developed by the ID Team, as described below. All of the specific concerns raised in the public scoping comments are captured in these summaries, regardless of the resource code they were assigned.

Many of the concerns raised in public scoping comments were related to issues identified by the ID Team during internal scoping. Section 4.3.1 lists the preliminary issues the ID Team retained for detailed analysis in the EIS and the specific concerns raised in public scoping comments related to each of these issues. These issues will be analyzed in detail in the EIS, and specific concerns raised by the public will be used to help refine the scope of those analyses and determine whether any of these preliminary issue statements warrant revisions.

Many other concerns raised in public scoping comments were related to preliminary issues that the ID Team did not initially retain for detailed analysis in the EIS. Section 4.3.2 lists the preliminary issues not initially retained for detailed analysis in the EIS and the specific concerns raised in public scoping comments related to each of these issues. The ID Team will evaluate each of these preliminary issue statements in light of the public comments that were received to determine whether any of these preliminary issue statements warrant revisions and to determine the appropriate level of analysis in the EIS. The EIS will provide rationale for any issues that are not retained for detailed analysis.

4.3.1 Themes and Concerns Identified in Public Scoping Comments Related to Preliminary Issues for Detailed Analysis

How would project construction, operation, and decommissioning affect native upland vegetation communities?

This preliminary issue statement was developed by the ID Team during internal scoping and will be analyzed in detail in the Lava Ridge Wind Project EIS. No public comments were received regarding upland vegetation.

How would vegetation phenology, and subsequently pollinators and plant reproductive success, be affected by changes to ground-level temperatures and precipitation from turbine operation?

Several public comments raised concerns regarding the effect of turbine operations on ground temperature, wind speed, and precipitation. One public comment expressed concern that the change in ground-level temperatures and evapotranspiration rates could negatively impact agricultural crops near turbines.

How would project construction, operation, and decommissioning affect pollinators?

Two public comments were received regarding pollinators, both of which requested surveys to identify pollinator populations in the siting corridors, an analysis of effects to these species, and that the resulting effects to pollinator services be detailed in the EIS.

How would the project affect big game habitat and species distribution in the analysis area (ground disturbance, introduction of invasive species, noise and human presence, and presence of a new facility)?

Specific concerns related to big game habitat and species distribution raised in public comments included the following:

- Effects on habitat in summer and winter ranges for mule deer (*Odocoileus hemionus*), elk (*Cervus canadensis*), and pronghorn (*Antilocapra americana*), especially on wintering habitat for elk
- Effects of increased traffic due to access road construction, including habitat avoidance and harassment

- Effects related to habitat connectivity and fragmentation

Several public comments included a request that the BLM coordinate closely with the Idaho Department Fish and Game to incorporate recent research and best available science on habitat use and migratory patterns, and to identify measures to avoid or minimize impacts to big game species.

How would turbine operations affect bat populations?

Concerns regarding bats identified in public comments focused on the risk of direct mortality from collisions with turbines; although "sonic" impacts were also mentioned as well as the need to implement stringent best management practices (BMPs) and other design features to minimize impacts to bats. Of particular concern were Townsend's big eared bat (*Corynorhinus townsendii*) and little brown bat (*Myotis lucifugus*), which are known to breed in the region, and hoary bat (*Lasiurus cinereus*), which migrates through the region. The NPS noted that bats are known to roost at Craters of the Moon National Monument and Preserve and that these bats may forage in or migrate through the siting corridors; the NPS requested that the EIS identify bat populations that move between Craters of the Moon National Monument and Preserve and the siting corridors and analyze the potential mortality rates and population effects. The NPS also requested an opportunity to provide input on the bird and bat conservation strategy for the project.

How would project construction, operation, and decommissioning affect bat roosting habitat?

This preliminary issue statement was developed by the ID Team during internal scoping and will be analyzed in detail in the EIS. No public comments were received regarding bat roosting habitat.

How would turbine operation and meteorological tower locations affect avian populations (including eagles)?

Concerns regarding avian populations identified in public comments focused on the risk of direct mortality from collisions with turbines as well as disruption to migratory routes. Concerns were also raised regarding the loss and/or fragmentation of habitat for migratory birds from construction. Although comments typically expressed general concern for migratory birds, some commenters raised concerns with specific species, including bald eagle (*Haliaeetus leucocephalus*), golden eagle (*Aquila chrysaetos*), ferruginous hawk (*Buteo regalis*), and turkey vulture (*Cathartes aura*). Several of the comments suggested ways to minimize, avoid, or mitigate impacts to raptors and other migratory birds such as conducting thorough preconstruction surveys, relocating the project outside of a migratory corridor, relocating turbines away from nests or areas where raptors congregate, and incorporating agency guidance and industry standard BMPs into project design. The NPS requested an opportunity to provide input on the project's bird and bat conservation strategy and eagle management plan. Other specific comments related to avian populations included the following:

A request that the EIS disclose the status of consultation with U.S. Fish and Wildlife Service regarding eagle take permits

Recommendations that the cumulative effects analysis for migratory bird species encompass their entire range

How would project operation affect greater sage-grouse (*Centrocercus urophasianus*) leks and sage-grouse breeding, nesting, and brood-rearing habitat?

Several public comments expressed concern over the proximity of turbines to active greater sage-grouse leks and suggested avoidance buffers of varying widths.

How would project construction, operation, and decommissioning affect the seasonal use or movement of greater sage-grouse?

Several public comments expressed concern that the greater sage-grouse surveys proposed in the preliminary POD (MVE 2021) would not adequately identify wintering habitat for greater sage-grouse, and these comments provided suggested revisions to the POD survey methodology.

How would the presence of additional aboveground structures affect greater sage-grouse mortality and habitat use?

Several public comments expressed concern that project components located within greater sage-grouse habitat may disturb or displace the species; one public comment specifically requested the EIS analyze greater sage-grouse mortality from project infrastructure. One other public comment noted that studies have shown that greater sage-grouse avoid habitat and lek sites within 3 miles of transmission lines, presumably due to increased predation by raptors.

How would ground disturbance during project construction and operation contribute to the direct or indirect loss or alteration of greater sage-grouse habitat?

Several public comments expressed concern that project construction would result in the loss, degradation, or fragmentation of greater sage-grouse habitat; commenters noted that the siting corridors overlap lands classified as a General Habitat Management Area for greater sage-grouse and are near lands classified as an Important Habitat Management Area or Priority Habitat Management Area. These comments also noted the continued downward trend in greater sage-grouse abundance in Idaho and emphasized that habitat loss and fragmentation are drivers of this decline. These comments included a number of suggested avoidance, minimization, and mitigation measures such as installing transmission lines underground, establishing protective buffers around leks and wintering grounds, and implementing offsite compensatory mitigation.

How would project construction, operation, and decommissioning affect habitat for BLM special-status mammal species (i.e., kit fox [*Vulpes macrotis*], Piute ground squirrel (*Urocitellus mollis*), and pygmy rabbit [*Brachylagus idahoensis*])?

This preliminary issue statement was developed by the ID Team during internal scoping and will be analyzed in detail in the EIS. Although several of the public comments regarding general effects to wildlife species and their habitat mentioned BLM special-status mammal species such as pygmy rabbit, no specific concerns regarding effects to BLM special-status mammal species were raised.

How would project construction, operation, and decommissioning affect the St. Anthony sand dune tiger beetle (*Cicindela arenicola*) habitat and population?

The Idaho Conservation League expressed concern that project construction and sand removal to support the project could negatively impact the St. Anthony sand dune tiger beetle by compacting soil and destroying burrows.

How would project construction, operation, and decommissioning affect monarch butterfly (*Danaus plexippus*) habitat and population?

One public comment expressed concern over the recent decline in monarch butterfly populations and requested an analysis of the impact of turbine operations on migrating insects.

How would project construction, operation, and decommissioning (clearing habitat, fragmentation, roads, invasive weeds) result in population declines to BLM special-status plant species?

This preliminary issue statement was developed by the ID Team during internal scoping and will be analyzed in detail in the EIS. No scoping comments were received regarding BLM special-status plant species.

How would ground disturbance from the project physically impact cultural resources?

Public comments regarding physical impacts to cultural resources from ground disturbance focused on concerns that a portion of the siting corridors overlaps the historical footprint of the Hunt War Relocation Center, which extends beyond the current boundaries of the Minidoka National Historic Site, and could result in impacts to previously undiscovered cultural resources during construction. Other public comments noted that the project may impact lava tubes and caves, which may contain cultural resources associated with past Native American use of these natural features. Several public comments expressed general concern for impacts to historic sites, whereas others raised concerns with specific sites such as the Kelton Freight Line Trail, Petroglyph Cave, Black Ridge Butte, Black Ridge Cave, Wilson Butte, and Wilson Cave. The Shoshone-Bannock Tribes expressed concern that the project may physically impact previously undiscovered cultural resources, including Native American grave sites

How would the installation of new aboveground infrastructure cause non-physical impacts to cultural resources (i.e., with visual, auditory, or atmospheric effects)?

Specific concerns related to non-physical impacts to cultural resources that were raised in public comments centered on the potential impact to views from the Minidoka National Historic Site. In particular, many public comments raised concerns that the potential visual impacts to Minidoka may negatively affect characteristics that contribute to its eligibility for the National Register of Historic Places. The comments identified a number of other cultural sites that may experience visual effects from the project, including the Oregon NHT, Stricker Store/Rock Creek Station, the Milner Ruts, the Milner Dam, the Brose House, and Hagerman Fossil Beds National Monument. The Shoshone-Bannock Tribes expressed concern with the potential impact to the cultural landscape from the visual disturbance of the project.

How would the project affect environmental justice communities, and would these effects be disproportionately adverse?

Several public comments recommended that the Nikkei (or Japanese American) community be considered an environmental justice population for purposes of analysis in the EIS. These comments further recommended that this analysis be expanded beyond the immediate vicinity of the siting corridors because of the widespread distribution of modern-day survivors and their descendants and because many of those incarcerated at Minidoka were relocated from the west coast or elsewhere. Many of these comments argued that the Nikkei community would face disproportionately adverse effects from the psychological harm and feelings of distrust and dishonor they would experience as a result of the project's impacts on the Minidoka National Historic Site.

How would jobs during construction and operation affect local unemployment rates, population, and housing availability?

Several public comments expressed support for the project because of the jobs that would be created in the renewable energy sector, many of these comments were submitted by students in the renewable energy program at the College of Southern Idaho. Many residents in the region submitted comments in opposition to the project due to concerns that the construction workforce would not be locally sourced. Specific concerns were raised regarding the inadequacy of the local labor pool to support the estimated construction workforce and the lack of available housing in the region for non-local workers.

How would project-related spending directly (wages, spending on materials and equipment) or indirectly (taxes on goods and services) contribute to the local and regional economy during construction and operation?

Several public comments expressed concern that that project would not benefit the local economy because most of the project-related jobs would go to non-local workers and because materials would be sourced from non-local or foreign manufacturers.

How would the presence and operation of wind turbines affect residential property values?

One public comment expressed concern over the impact of the project on the value of nearby residential property. The State of Idaho requested the EIS include an analysis of effects to private property values near the siting corridors.

How would project construction, operation, or decommissioning/reclamation affect 1) the risk of (human- or natural-caused) wildfire ignition and spread in the analysis area (the area within 20 miles of the siting corridors) and 2) wildfire response and suppression efforts?

Several public comments expressed concern that the project could increase the risk of wildfires because of the increased access from the construction of new roads and the spread of invasive annual grasses or as result of malfunctioning turbines and sparks from transmission lines. Comments from grazing allottees in the siting corridors raised specific concerns regarding the impact of increased wildfire risk and severity on livestock forage and stocking rates. One comment expressed concern that the loss of range improvements, such as water pipes and stock ponds, could reduce sources of water for fire suppression. Some of these comments provided suggestions for measures to minimize fire-related impacts. The U.S. Environmental Protection Agency (EPA) requested the EIS include an analysis of the potential effect on fire management decisions due to the need to protect project infrastructure.

How would project construction and operation affect the fuels reduction aspect of habitat restoration projects that have been carried out in the area and identified in the integrated program of work?

This preliminary issue statement was developed by the ID Team during internal scoping and will be analyzed in detail in the EIS. No public scoping comments were received regarding habitat restoration projects.

How would construction and operation of the project affect existing and reasonably foreseeable land use authorizations (i.e., designated rights-of-way, communication sites, authorized land uses, or Federal Aviation Administration/aviation uses)? Would the project result in the permanent conversion of existing land uses?

Comments received from the Southern Idaho Regional Communications Center (SIRCOM), which provides 911 access in the region, and Project Mutual Telephone, a local telecommunications provider, indicated that project infrastructure may obstruct their existing microwave communication pathways. SIRCOM expressed concern that the design features recommended in the Commsearch report would not be sufficient to prevent temporary interruptions to local telecommunications, including 911 service. The Idaho Military Division requested a microwave path study be performed.

How would project construction, operation, maintenance, and decommissioning affect available livestock forage and subsequent grazing permit active preference?

Several public comments, many of which were submitted by grazing permittees whose allotments overlap the siting corridors, raised concerns regarding the effect of the project on forage for livestock and

questioned the accuracy of the data used to estimate impacts to animal unit months (AUMs) in the POD. These comments also expressed concern that some of the measures to minimize impacts to grazing operations presented in the POD, such as rotating pastures to avoid areas where construction is actively occurring, are not feasible or would not be adequate to address impacts. Several of these comments also suggested that permittees should receive compensation for any lost AUMs. The State of Idaho specifically requested the EIS include a discussion of dust abatement measures to prevent increases in unpalatable forage near roads and construction sites. Another public comment specifically questioned how AUMs lost during construction and operations would be re-allocated following decommissioning.

How would turbine operation, vehicle traffic, and increased human presence from the project physiologically affect livestock?

Several specific issues were raised in public comments regarding physiological effects to livestock, including the following:

- Health effects of turbine noise and potential displacement of livestock due to turbine noise
- The effect of electromagnetic fields on livestock health and reproduction
- The effect of increased access and traffic from road construction on livestock mortality
- The effect of stress from increased disturbance on livestock reproduction
- Increased predation due to turbines limiting aerial predator control options

Many of these comments were submitted by grazing permittees whose allotments overlap the siting corridors. Several of the comments included additional data sources for consideration. Comments from the grazing permittees also suggested that the BLM or MVE set up a "depredation fund" to compensate permittees for any livestock lost as a result of direct and indirect health effects of turbine operations.

How would ground disturbance associated with the project physically affect known or unknown paleontological resources in areas with mapped igneous geology (basalt)?

One public comment expressed concern that unique fossils such as lava tree molds may be present in the siting corridors and requested that surveys and micro-siting of infrastructure be implemented to avoid impacts to these features.

How would the project affect big game hunting access and opportunities, and how would changes in hunting access and opportunities affect the existing BLM-permitted hunting outfitter?

Several public comments expressed concern that the project would reduce hunting opportunities or hunter access or requested that the EIS include a detailed analysis of these effects. Many of these comments also expressed concern that the project would lead to declines in populations of game species due to loss of forage and loss or fragmentation of habitat. The comments also noted the importance of hunting to the local economy; however, no public comments were received specific to the existing BLM-permitted hunting outfitter.

How would project construction and operation impact sensitive soils, soil health, and plant growth material quantity and quality due to the effects of soil horizon mixing and loss or degradation of soil resources (native seed bank, nutrients, organic matter, and microbial communities)?

One public comment expressed concern that soils in the siting corridors are susceptible to erosion and have already been damaged by livestock grazing and that the project would exacerbate this ongoing soil loss. Two other public comments requested an analysis of topsoil stockpiling for reclamation, and the

State of Idaho requested an analysis of effects to soils from installation of the electrical collection system. One comment suggested that the BLM decommission unneeded roads, where feasible, to reduce erosion and sedimentation in the siting corridors.

How would traffic associated with the construction, operation, and decommissioning of the project affect existing traffic patterns on major public roads?

One public comment expressed concern that increased traffic from the project would diminish the quality of life for local residents. The Idaho Conservation League requested that a detailed transportation plan be included in the EIS and suggested several measures to minimize impacts, including the use of local railroads to transport equipment and materials and the use of timing restrictions during known periods of high traffic (such as the opening day of the hunting season).

How would the introduction of project components impact sensitive viewing platforms (i.e., key observation points [KOPs])? How would the existing visual character and scenic quality be impacted by the introduction of project components?

Impacts to views from KOPs and to the scenic quality of the region were the most common concern raised in public comments. Most of these comments focused on the impacts to views from the Minidoka National Historic Site. Other potential sensitive viewing platforms mentioned frequently in the public comments included scenic byways/highways and other major routes in the region, nearby towns and residences, Kimama Butte, Craters of the Moon National Monument and Preserve, and Lake Walcott State Park. The Shoshone-Bannock Tribes expressed general concern with the visual impacts of the project. Many local residents expressed concern that the visual impact of project infrastructure would detract from the existing rural/pastoral quality of the landscape.

How would lighting associated with project construction, operation, and decommissioning impact sensitive viewers and night skies, including at Craters of the Moon National Monument and Preserve, of which 54,000 acres are designated as an international dark sky park? How would aircraft warning lighting impact sensitive viewers and night skies during operation?

A number of public comments, including a comment from the NPS, expressed concern that the aircraft warning lighting would have significant impacts on night skies in the region, particularly to the international dark sky park at Craters of the Moon National Monument and Preserve. The NPS also recommended the EIS identify the nighttime visibility threshold of the project and provide nighttime photo simulations from KOPs. Concerns were also raised regarding lighting for nighttime construction, and several public comments provided suggestions for measures to minimize impacts.

How would the introduction of wind turbines and associated shadow flicker impact either KOPs or sensitive receptors that are specific to shadow flicker (e.g., residences or businesses) within 2 miles of the siting corridors?

This preliminary issue statement was developed by the ID Team during internal scoping and will be analyzed in detail in the EIS. No public comments were received regarding shadow flicker.

How would groundwater withdrawals (up to six wells) needed for construction and operation of the project affect groundwater quality and quantity in the area?

Numerous public comments raised concerns that vibration from turbine operation may impact the aquifer or groundwater. Other public comments noted the importance of groundwater to agricultural and ranching operations near the siting corridors and requested the EIS include an analysis of the effect of the project

on local groundwater levels. Some comments included suggestions for measures to minimize impacts, such as purchasing water from existing water rights.

How would construction of the project affect streams, wetlands, and ponds in the siting corridors?

Several public comments expressed concern that surface or groundwater withdrawals to supply water for construction may affect surface water in the region or that project features such as roads could alter local hydrology. The NPS recommended the EIS disclose the water source(s) for the project and analyze changes in groundwater flow or surface water availability. The EPA recommended the EIS identify any impaired waters that may be affected by the project, how the project would coordinate with ongoing restoration efforts for those waters, and any mitigation measures that would be implemented to prevent further degradation. The EPA also requested the EIS discuss how the project would meet the antidegradation provisions of the Clean Water Act, how stormwater runoff would be managed, as well as potential sources of drinking water contamination and measures that would be taken to protect drinking water sources. The EPA noted the potential for impacts to waters of the United States and recommended the EIS analyze this issue in detail.

**4.3.2 Themes and Concerns Identified in Public Scoping
Comments Related to Preliminary Issues not Initially
Retained for Detailed Analysis**

How would criteria pollutants, hazardous air pollutants (HAPs), and fugitive dust created during construction, reclamation, and decommissioning affect air quality, including air quality-related values (AQRV) at Class I areas or non-attainment areas?

Several public comments expressed concern that dust generated during construction would negatively affect air quality in the region. The NPS specifically requested the EIS analyze the effect of fugitive dust and emissions from construction vehicles and equipment on air quality in the Class I airshed at Craters of the Moon National Monument and Preserve. The EPA requested the EIS disclose baseline conditions for ambient air quality, including concentrations of criteria pollutants (National Ambient Air Quality Standards) and the potential sources and quantities of criteria pollutants and HAPs associated with the project. The comments also requested that MVE implement design features and mitigation measures to reduce impacts to air quality, including implementation of air quality monitoring during construction to allow for adaptive management of air quality impacts.

What quantity of greenhouse gas (GHG) emissions would be emitted from construction and restoration of the project, and how do GHG emissions contribute to climate change?

Most public comments regarding climate change expressed support for the project because it would help reduce fossil fuel consumption and GHG emissions that cause climate change. The EPA specifically requested the EIS disclose expected GHG emissions, particularly sulfur hexafluoride (SF₆) emissions. The EPA also requested the EIS disclose the reasonably foreseeable effects of climate change on the Project and natural resources in the project vicinity. The EPA expressed concern that the project could be threatened by increasingly severe weather as a result of climate change and recommended the BLM incorporate climate resiliency and adaptive management measures into the Proposed Action to prevent disruptions in power generation during extreme weather or other natural disasters.

How would ground disturbance associated with project construction introduce and/or spread noxious weeds and other invasive plant species?

How would the introduction of noxious weeds and invasive species affect revegetation success?

Concerns regarding vegetation identified in public comments focused on the potential for the introduction and/or spread of noxious and invasive weed species in disturbed areas, especially along new access roads. Specific concerns included the following:

- The effect of noxious and invasive weeds on forage for livestock and wildlife
- The effect of annual grass invasion on wildfire intensity and frequency
- The potential for "spillover" effects outside the siting corridors, including effects to sensitive vegetation communities at Craters of the Moon National Monument and Preserve

The EPA requested the EIS include an invasive plant management plan and describe BMPs and other design features that would be implemented to control noxious and invasive weeds in the siting corridors. The comment from the EPA also included suggested methods for reseeding disturbed areas.

How would increased vehicle traffic increase the risk for direct mortality of big game species?

One public comment raised concerns that increased vehicle traffic could increase the risk of mortality to big game species from collisions with vehicles. The State of Idaho requested the EIS include an analysis of mortality from vehicles and a description of measures that would be implemented to minimize this risk.

How would changes in hunter access via new or improved roads affect big game populations?

Two public comments expressed concern that the construction of new access roads would lead to an increase in hunting pressure for big game species.

How would project construction and operation affect foraging resources? How would project operation cause changes to migratory or territory use?

Several public comments noted that the project would be constructed within known migratory corridors for bats, birds, and big game species and winter territory for mule deer, elk, and pronghorn; these comments raised concerns that project features such as fences could present barriers to migration and that the increased human presence and noise and visual disturbances could alter migratory patterns or cause avoidance of seasonal territories. Several comments questioned the adequacy of existing data sources and previous studies and provided recommendations for big game surveys or additional data sources for review. The NPS recommended the EIS analyze impacts to habitat connectivity for species that move between the siting corridors and nearby NPS properties. The State of Idaho and several others requested the EIS provide a detailed analysis of disruption of migration-movement routes and habitat connectivity and disturbance and displacement from preferred habitats. Comments also included a variety of suggested measures to minimize these impacts, including wildlife friendly fencing design, ceasing turbine operations when flocks of birds or bats approach, and marking transmission lines to reduce avian collision risk.

How would project construction and operation directly affect bat foraging habitat (such as light pollution)? How would noise and human presence from operation activity, equipment, and personnel affect bat habitat use? How would habitat disturbance affect prey populations?

The State of Idaho requested the EIS include an analysis of effects to bats, including potential behavioral modifications, and measures to minimize these effects.

How would project construction and operation affect avian habitat?

Many public comments expressed general concern regarding effects to wildlife habitat; several of these comments expressed specific concerns that ground disturbance from project construction would degrade, destroy, or fragment avian habitat. These comments also recommended that avian habitat loss or damage be compensated through off-site mitigation.

How would project construction and operation affect prey species in the analysis area?

One public comment expressed concern that the project construction would reduce habitat for prey species.

What collision and electrocution risks do aboveground transmission lines pose to raptors (including eagles)?

Several public comments noted that aboveground transmission lines are known to increase the risk of raptor mortality through collisions and electrocution. These comments included a variety of suggested measures to minimize these effects or references to industry-standard BMPs. Some comments questioned the adequacy of raptor nest surveys for evaluation collision risk outside the breeding period.

How would the estimated change in available AUMs affect the local economy?

Several public comments noted the important contribution of ranching to the local economy and expressed concern that a loss of AUMs could reduce the income generated by livestock grazing. Some of these comments questioned whether there would be a net benefit to the local economy from the project because of the potential for project-related income to be offset by losses associated with a reduction in available AUMs. The Shoshone-Bannock Tribes specifically requested the EIS include an analysis of the effect to the local economy from impacts to grazing and agricultural operations.

How would project construction and operation contribute to changes or degradations to resources that would affect hunting spending?

Several public comments noted the importance of hunting and fishing spending to the local economy and expressed concern that the impact of the project on big game populations and hunter access would reduce local hunting and fishing spending. Specific causes of reduced hunter opportunity (and thus spending) identified in these comments include the following:

- Loss or fragmentation of big game habitat or displacement due to road construction and off-highway vehicle (OHV) use
- Increased hunting pressure and human disturbance
- Disturbance to as much as 22% of the huntable BLM lands within Game Management Unit 53
- Increased big game mortality from vehicle collisions and conflicts with private landowners/agricultural producers

What change in demands on public facilities and services would result from uses by employees or the project during construction and operation?

The Dietrich School District Board of Trustees expressed concern that local schools would not have the capacity to accommodate the influx of students associated with non-local workers relocating to the area with their families during construction. Other public comments raised concerns that the local tax revenue

generated by the project would be insufficient to cover the cost of additional public infrastructure that would be needed to accommodate non-local workers and their families.

How would the project impact emergency responders that serve the project vicinity?

Several public comments expressed concern that the project would increase the demand for emergency services locally and that the access road network would attract criminal activity. One public comment raised concerns that local law enforcement would not have the capacity to patrol the access roads that would be constructed for the project.

Would project construction, operation, maintenance, or decommissioning and reclamation activities pose hazards to pilots during aerial fire suppression or crop dusting operations?

Several public comments expressed concern that crop-dusting operations and aerial fire suppression efforts would be negatively affected by the project due to the flight hazard posed by the turbines. A number of these comments noted the importance of aerial support during fire suppression and expressed concern that wildfires near the siting corridors would be more difficult to control because the turbines would preclude aerial suppression activities.

How would construction affect the functionality of range improvements during the allotment grazing period?

A number of public comments, many of which were submitted by grazing permittees, expressed concern that range improvements (such as fences, gates, cattleguards, water pipes, and troughs) could be damaged or destroyed during project construction. Some of these comments also raised concerns that livestock could be lost due to cut fences and gates left open as a result of increase public access in the area. Several public comments recommended that MVE be financially responsible for maintaining or replacing range improvements. Other comments suggested that strategic placement of fencing and water troughs could be used during project construction and operation to reduce effects to livestock. The State of Idaho specifically requested the EIS include a detailed analysis of impacts to existing and new range improvements.

How would new fences associated with operation and maintenance sites and substations and new gates on access roads affect grazing permittees?

The State of Idaho specifically requested the EIS disclose who would be financially responsible for new range infrastructure (such as fences and cattle guards) required by the project.

How would restoration of temporary disturbed areas, including noxious weed control, affect grazing permittees?

Several public comments noted that it would take at least 2 years for rangeland to recover after reseeding and provided recommendations for reseeding techniques, timing, and seed mixes. These comments emphasized that controlling noxious weeds such as downy brome (cheatgrass; *Bromus tectorum*) would be a crucial component of successful revegetation.

Would construction of the project limit or restrict access to locatable minerals in and around the siting corridors?

One public comment expressed concern that the project would limit the public's ability to stake new claims for locatable minerals in the siting corridors.

How would noise generated by project construction, operation, and decommissioning affect sensitive receptors, e.g., greater sage-grouse leks, raptor nests, livestock, cultural sites, schools, and residences?

A number of public comments, many of which were submitted by local residents, expressed concern that noise generated by the project could have negative effects on the health of those living near the project. Several of these comments provided quotes from, or references to, scientific literature that supports the conclusion that long-term exposure to noise from turbine operations can disrupt sleep, increase stress, and contribute to a variety of physical and mental health issues in both humans and livestock. The Dietrich School District Board of Trustees expressed concern that noise from turbine operations may disrupt learning for students at schools near the siting corridors.

Several public comments noted the large number of historic properties and cultural sites near the siting corridors and raised concerns that these sites could be negatively impacted by project-related noise. Of particular concern was the impact of noise on the visitor experience at the Minidoka National Historic Site.

Many public comments raised general concerns that noise from project construction and turbine operation could negatively impact wildlife near the siting corridors. Specific noise-related effects to wildlife identified in public comments include the following:

- Increased sensitivity of wildlife to low frequency noise
- Increased effects to wildlife that rely on noise for hunting or navigation, such as snakes and bats
- Disruption of communication and breeding
- Displacement or habitat avoidance

The EPA recommended the EIS identify sensitive noise receptors and analyze potential effects to wildlife and human health. Further, the EPA recommended using C-weighted and/or A-weighted decibels to quantify low frequency sound associated with turbines. The EPA also provided decibel thresholds for avoiding specific types of noise-related effects and noted that these thresholds should be reduced when the noise is composed primarily of low frequency sounds.

How would the construction, operation, and decommissioning of the project affect dispersed recreational opportunities and setting for activities such as OHV use, driving for pleasure, photography, dispersed camping, horseback riding, hiking, wildlife viewing, photography, and winter recreation?

A number of public comments, many of which were submitted by local residents and recreation organizations, expressed concern that the project would negatively affect opportunities for dispersed recreation in the siting corridors. Specific concerns included loss of access for OHV users and decreased wildlife viewing opportunities due to displacement. The State of Idaho specifically requested the EIS include a detailed analysis of project's impact on OHV recreation and user experience at Lake Walcott State Park. The NPS requested the EIS include a detailed analysis of the potential cumulative effects to visitation at Craters of the Moon National Monument and Preserve and the Minidoka National Historic Site and noted the contribution of recreation at NPS properties to the local economy. A comment from the BlueRibbon Coalition expressed concern that the BLM has underestimated the existing level of recreational use in the siting corridors and requested that the BLM collect additional information on recreational use in the area.

How would the construction, operation, and decommissioning of the project impact public motorized access?

Several public comments expressed concern that existing public roads and access points would be closed as result of the project.

How would the project's increased motorized access affect recreational uses of cave resources?

The Idaho Conservation League expressed concern that cultural resources associated with caves could be indirectly impacted as result of increased recreational access to these caves.

How would the project's operation traffic impact traffic patterns and the condition and maintenance of major public roads?

Several public comments raised concerns that project-related traffic would damage local roads and lead to increased maintenance needs and costs. These comments questioned who would be responsible for maintaining new access roads and who would bear the cost of increased maintenance on existing public roads. Public comments also raised questions regarding the source of aggregate for road construction and the lack of suitable aggregate sources in the region. The Idaho Transportation Department (ITD) provided specific information on the functional classification and structural pavement design for existing public roads identified as potential access routes for the project. The ITD recommended the EIS disclose the access routes that would be used for the project and provide estimates of predicted traffic to help identify roads that should receive preventive maintenance prior to construction. The Dietrich School District Board of Trustees raised concerns that damage to routes used by the district's buses would result in increased fleet maintenance costs and disrupt their ability to provide bus service for students. A number of public comments also expressed concern that project-related traffic would lead to congestion and delays on local routes.

How would the weight/load characteristics of project construction, operation, and decommissioning truck traffic impact the existing major public roads?

Several public comments, including a comment from the ID Team, expressed concern that existing local access roads are not capable of accommodating overweight or oversized loads and that these roads may require preventive maintenance or improvements to accommodate larger loads.

How would hazardous materials and wastes generated by the project be managed? Would these wastes exceed capacities of approved disposal facilities?

Many public comments requested information on how wastes generated by the project would be handled and expressed concern that large amounts of waste, such as decommissioned turbines, would be left in place or buried on-site. Specific concerns were raised regarding the potential for spills and leaks of hazardous materials, such as oil in turbines. The EPA requested the EIS describe measures to minimize impacts related to solid and hazardous wastes and procedures that would be implemented were a spill or leak to occur.

Would groundwater be contaminated from wind turbine generator foundation construction (e.g., excavation and blasting impacts to surface and groundwater)?

One public comment requested the EIS disclose the amount of ammonium nitrate and other blasting materials that would be used and the potential effects to surface and groundwater quality.

How would the project impact floodplain function?

The EPA specifically requested the EIS disclose impacts to floodplains and describe measures to minimize those impacts.

Some public scoping comments did not necessarily raise a resource-specific concern, but instead were related to the description of the project, the decision-making or NEPA process, data sources and analysis methodology, policy and regulatory compliance, or public and stakeholder involvement. Other comments were requests for additional information, for coordination/consultation, or to be added to the mailing list. A number of comments included suggestions for design features, BMPs, mitigation measures, or other measures to minimize adverse effects. Summaries are provided below for each of these process categories. Refer to the comments in Appendix D for additional detail.

4.3.3 Alternatives

Several public comments noted the NEPA requirement to develop and consider a range of reasonable alternatives and emphasized the importance of this step in the decision-making process. Public scoping comments also included a variety of suggested modifications to existing alternatives or proposed entirely new alternatives. The most common recommendations centered on alternatives that would minimize or entirely avoid impacts to the Minidoka National Historic Site. Although some of the recommended alternatives or modifications were intended to reduce or avoid physical impacts to cultural resources within the historical footprint of the site's internment camp, many commenters stated the historical and cultural significance of the site warrants the development of alternatives or modifications that would entirely eliminate visual and auditory impacts to the site. A number of comments recommended alternative locations, reduced scale alternatives, or specific modifications to existing alternatives to avoid or minimize a variety of other resource conflicts including

- impacts to known wildlife migratory corridors;
- impacts to wintering habitat for big game;
- impacts to greater sage-grouse wintering habitat and general habitat management areas;
- visual impacts to local communities, Craters of the Moon National Monument and Preserve, and cultural sites; and
- impacts to current livestock grazing operations and range improvement projects.

Other comments suggested the EIS explore alternatives that use other renewable technologies such as bladeless (vortex) turbines, a solar facility, local micro grids, or distributed rooftop solar generation. Other potential alternatives identified in public scoping comments included alternative transmission options, alternative (power) storage technologies, and a phased development alternative.

4.3.4 Attention/Action Needed

Any public comment that required a response from the BLM or warranted special attention was included in this category. Most of these comments were requests for specific information or documents or requests to be added to the mailing list for the project. This category also included several comments that threatened litigation or formally requested the BLM pause or "restart" the NEPA process because they felt the BLM's community outreach and notification process did not comply with policies for early engagement with environmental justice outlined in Executive Order (EO) 13985 and DOI Secretarial Order (SO) 3399.

4.3.5 Analysis Methods and Data

Many public comments raised concerns with the adequacy of existing data sources, provided additional data sources for consideration, or recommended specific analysis methodologies. Specific concerns with existing data were raised by several grazing permittees who commented on the lack of detailed information in the POD and questioned the accuracy of estimated impacts to grazing operations. The BlueRibbon Coalition expressed concern regarding the lack of data on existing recreational use in the vicinity of the siting corridors. Concerns were also raised with the adequacy of existing data sources and the surveys that are proposed for a variety of wildlife species. Specifically, there were concerns that nest surveys for greater sage-grouse and raptor species would be insufficient to inform the analysis of effects to these species outside of their breeding range and season. There were also concerns regarding the lack of data on big game, avian, and bat migratory patterns in the region and in the vicinity of the project. The Shoshone-Bannock Tribes indicated they do not support the use of predictive models in the place of pedestrian surveys for cultural resources.

This category also included comments regarding the analysis of cumulative effects in the EIS. Several of these comments expressed concern with the recent revisions to the Council on Environmental Quality regulations implementing NEPA, emphasized that this guidance is in the process of being revised again, and noted that BLM NEPA guidelines still require cumulative effects be analyzed in NEPA documents. Other comments, including several from the NPS, requested an analysis of cumulative effects to specific resources in the EIS. Multiple comments suggested that the construction of SWIP-North should be considered a connected action for purposes of analysis in the EIS.

4.3.6 Decision Process

This category included comments related to NEPA and the decision process. Some comments expressed concern that the project would set a precedent for similar projects in the future. The NPS commented that the complexity of the project warrants extended document review times for cooperating agencies and preparation of a project integration schedule to track the progress of overlapping and interrelated permitting schedules. Several comments recommended that a supplemental EIS be prepared following final siting of turbines to address site-specific impacts.

Comments were also received regarding the adequacy of the *Monument Resource Management Plan* (BLM 1986), including the lack of visual management guidelines and guidance for public utility projects. A number of comments were also received regarding the need to consult with the NPS. Comments related to consultation under Section 106 of the National Historic Preservation Act, many of which were submitted by Japanese American community organizations, were primarily formal requests to participate in the process as a consulting party. The Coalition to Protect America's National Parks requested that the Advisory Council on Historic Preservation be included in Section 106 consultation. Several comments discussed compliance with Section 7 of the ESA, one of which questioned how the permitting process would be affected if the monarch butterfly, which is currently a candidate for listing, became listed under the ESA prior to the BLM's decision.

Comments were also received regarding general compliance with other federal, state, and local laws, policies, and regulations. Of particular concern were laws and policies related to the Minidoka National Historic Site and environmental justice communities. These comments noted the need to comply with EO 13985 and SO 3399 and noted the emphasis the current presidential administration has put on considering environmental justice concerns in the renewable energy development process. Other laws and policies discussed in these comments included the Japanese American Confinement Sites Act and the Historic Sites Act. Commenters also noted requirements of the Organic Act and guidance provided in EOs 13112 (invasive species), 11988 and 13690 (floodplains), 14008 (climate), 13175 (tribal consultation), and

12898 (environmental justice). Other comments mentioned the need to comply with county plans and site-specific plans for the Minidoka National Historic Site, Craters of the Moon National Monument and Preserve, and the Snake River Plain Aquifer. The Shoshone-Bannock Tribes expressed concern that construction of the project may interfere with the ability of Tribal members to exercise their treaty rights to use public land in the region for traditional uses.

4.3.7 Design Features

Many commenters recommended implementation of specific design features, BMPs, or mitigation measures to minimize or avoid impacts to a variety of resources. Some comments provided suggestions for additional sources of design features, such as the *Final Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States* (BLM 2005) and Avian Power Line Interaction Committee (APLIC) guidelines (APLIC 2006, 2012).

4.3.8 Editorial

Comments in this category included a request that maps in the EIS display the boundaries of nearby NPS properties and requested that maps in the EIS display specific features associated with the Minidoka National Historic Site.

4.3.9 Out of Scope

Comments in this category raised issues that are beyond the scope of this analysis, including comments regarding landscape-scale planning for energy development, comments on other wind projects and the authorized SWIP-North, and comments on BLM grazing applications.

4.3.10 Purpose and Need

The U.S. Environmental Protection Agency and Idaho Conservation League commented on the importance of properly defining the purpose and need for the project in the EIS to allow for development of an appropriate range of alternatives for analysis.

4.3.11 Project Description

This category included any comments or questions regarding the description of the Proposed Action, as well as comments regarding material sources and supply chains. Many of these comments requested specific information on decommissioning and reclamation methods or expressed concern that turbines would be left on-site. Comments regarding material sources and supply chains primarily focused on the environmental impacts of manufacturing equipment and materials and transporting them to the siting corridors. Many of these comments argued that these adverse effects outweigh any environmental benefits of wind power.

4.3.12 Public and Stakeholder Involvement

Comments in this category focused on concerns that the public outreach and engagement for the project have been inadequate. Many of these comments expressed disappointment in the lack of involvement of the Japanese American community early in the planning process. Several comments emphasized the importance of government-to-government consultation with local Tribes.

4.3.13 Support or Opposition

These two categories were used for comments that expressed support or opposition for the project but did not raise specific concerns that inform the scope of analysis in the EIS. Many of these comments listed generalized concerns regarding effects to numerous resources but did not identify any specific issues or provide new data to consider.

5 FUTURE STEPS IN THE NEPA PROCESS

The BLM will use the comments collected during scoping to define issues and to develop a range of alternatives to address those issues. The impacts that could result from implementing each of the alternatives will be disclosed and analyzed in the draft EIS. Upon completion of the draft EIS, it will be made available for public review and public comment. The draft EIS is currently anticipated for public review and comment in summer 2022.

6 LITERATURE CITED

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- Magic Valley Energy, LLC (MVE). 2021. *Lava Ridge Wind Project Plan of Development*. Available at: <https://eplanning.blm.gov/eplanning-ui/project/2013782/570>. Accessed October 15, 2021.

APPENDIX A
Scoping Notices

engaging in Class III gaming activities on Indian lands. As required by 25 CFR 293.4, all compacts and amendments are subject to review and approval by the Secretary. The Amendment expands the types of authorized games to include events wagering with geofencing, adds the Nation's minimum internal control standards for sports betting, including rules governing events wagering, and replaces any references to the Oneida Indians of Wisconsin with Oneida Nation. The Amendment is approved.

Bryan Newland,

Principal Deputy Assistant Secretary—Indian Affairs.

[FR Doc. 2021–17858 Filed 8–19–21; 8:45 am]

BILLING CODE 4337–15–P

DEPARTMENT OF THE INTERIOR

Bureau of Indian Affairs

[212A2100DD/AAKC001030/
A0A501010.999900253G]

Indian Gaming; Approval of Tribal-State Class III Gaming Compact in the State of Oregon

AGENCY: Bureau of Indian Affairs, Interior.

ACTION: Notice.

SUMMARY: This notice publishes the approval of Amendment IV to the Tribal-State Compact (Amendment) between the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians (Tribe) and the State of Oregon (State).

DATES: The compact takes effect on August 20, 2021.

FOR FURTHER INFORMATION CONTACT: Ms. Paula L. Hart, Director, Office of Indian Gaming, Office of the Deputy Assistant Secretary—Policy and Economic Development, Washington, DC 20240, paula.hart@bia.gov, (202) 219–4066.

SUPPLEMENTARY INFORMATION: Under section 11 of the Indian Gaming Regulatory Act (IGRA), Public Law 100–497, 25 U.S.C. 2701 *et seq.*, the Secretary of the Interior shall publish in the **Federal Register** notice of approved Tribal-State compacts for the purpose of engaging in Class III gaming activities on Indian lands. As required by 25 CFR 293.4, all compacts and amendments are subject to review and approval by the Secretary. The Amendment authorizes the Tribe to engage in sports pool wagering at the Tribe's class III gaming facility, updates the Compact to reflect this change in various sections, updates the forms of payment that may be accepted to coincide with the State Lottery, includes provisions to protect

personal data of customers, requires certification for any new technology from an independent gaming test laboratory, and corrects previous errors in numbering of Amendments I, II, and III. The Amendment is approved.

Bryan Newland,

Principal Deputy Assistant Secretary—Indian Affairs.

[FR Doc. 2021–17860 Filed 8–19–21; 8:45 am]

BILLING CODE 4337–15–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[21X.LLIDT030000.L51010000.ER0000.
LVRWD2104400.241A00;4500154900]

Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Lava Ridge Wind Project in Jerome, Lincoln, and Minidoka Counties, Idaho

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: Consistent with the regulations implementing the National Environmental Policy Act (NEPA) and the Federal Land Policy and Management Act (FLPMA), the Bureau of Land Management (BLM) announces its intent to prepare an Environmental Impact Statement (EIS) for the proposed Lava Ridge Wind Project (Lava Ridge). This notice initiates the scoping process and temporary segregation of public lands from appropriation under the public land and mining laws. Additionally, this NOI seeks public comment and input under the National Historic Preservation Act (NHPA) and its implementing regulations.

DATES: The BLM requests comments concerning the scope of the analysis and identification of relevant information, studies, and analyses. All comments must be received by September 20, 2021. The Draft EIS is scheduled for the summer of 2022 and the Final EIS is scheduled for late 2022 with a Record of Decision issued no sooner than 30 days after the Final EIS is released. The BLM will hold public scoping meetings; the dates, locations, and times will be announced at least 15 days in advance through public notices, media releases and/or mailings.

ADDRESSES: Send written comments to: Lava Ridge Wind Energy EIS, BLM Shoshone Field Office, Attn: Kasey Prestwich, 400 West F Street, Shoshone, ID 83352. Send comments via email to BLM_ID_LavaRidge@blm.gov. Submit comments online at <https://go.usa.gov/>

[xFKxg](#) and click on the “Participate Now” button to the right of the document link. Enter your comment and information, then click “Submit”.

FOR FURTHER INFORMATION CONTACT:

Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352, 208–732–7204, kprestwich@blm.gov. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FRS is available 24 hours a day, seven days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION:

Purpose and Need for the Proposed Action

In Executive Order 14008, President Biden emphasized the need for the United States to “deploy the full capacity of its agencies to combat the climate crisis” in an approach that focuses attention on “innovation, commercialization, and deployment of clean energy technologies and infrastructure.” The Department of the Interior (DOI) has prioritized “identifying steps to accelerate responsible development of renewable energy on public lands and waters.”

Magic Valley Energy's, LLC (MVE) goal for Lava Ridge is to construct and operate a commercial-scale wind energy facility that reliably and economically produces wind energy for delivery to power markets in the western United States. This goal arises from regulatory, utility, and consumer-driven objectives to incorporate new renewable and carbon-free energy sources into energy supply portfolios. Substantial increases in new renewable energy are required to meet this need. Most western states have specific renewable energy goals. Based on the goals and objectives of the proponent and the BLM's authority, the BLM will evaluate the ROW grant application submitted by MVE in compliance with FLPMA, BLM regulations, and other applicable Federal laws and policies. The need for the BLM's action arises from FLPMA, which establishes a multiple use mandate for management of Federal lands, including “systems for generation, transmission, and distribution of electric energy” (FLPMA Title V). The BLM's action in considering MVE's ROW application is a delegated authority of the Secretary of the Interior to “grant issue or renew rights of way . . . for generation,

transmission, and distribution of electric energy” (43 CFR part 2800).

Preliminary Proposed Action and Alternatives

As described in the plan of development (POD), MVE proposes to construct Lava Ridge which includes up to 400 wind turbines with a maximum height of up to 740 feet, up to seven new substations, a battery energy storage system, three operations and maintenance facilities and associated infrastructure. Associated infrastructure required by the project includes access roads, electric collector lines and transmission lines to interconnect the generated power to the electric grid.

The Draft EIS will analyze a reasonable range of alternatives to be fully developed after considering information provided during the scoping period. Preliminary alternatives may include changes to proposed facility layouts, activity schedules, and seasonal operation requirements designed to protect resources under BLM management while still retaining a reliable and economically feasible wind energy facility. The range of alternatives analyzed in the Draft EIS will include a no action alternative. Under the no action alternative, the BLM would deny the application, and MVE's wind energy facility described in the POD would not be built.

Summary of Expected Impacts

The Draft EIS will identify and describe the effects of the Proposed Action on the human environment. Based on a preliminary evaluation of resources, the BLM expects impacts (either beneficial or adverse and of varying intensity) to wildlife and their habitats, land uses, cultural resources, visual resources, and social and economic conditions.

Preliminary issues of concern to be analyzed in the EIS include, but are not limited to:

- Short-term or long-term loss of wildlife habitat, including greater sage-grouse, and sensitive plant species due to ground disturbance;
- Changes to visual character and scenic quality due to the development and operation of the proposed project;
- Changes in access to and the quality and quantity of recreation and grazing resources for existing users;
- Changes to social and economic conditions resulting from the development and operation of the proposed project; and
- Physical, visual, and audible disturbance to historic properties and cultural properties within and outside of the project area.

Anticipated Permits and Authorizations

In addition to the requested ROW grant, other Federal, state, and local authorizations will be required for Lava Ridge. These include authorizations under the Bald and Golden Eagle Act, Clean Water Act, 14 CFR part 77, and other laws and regulations determined to be applicable to Lava Ridge.

Schedule for the Decision-Making Process

The BLM expects to issue a decision by early 2023. It is anticipated that MVE will secure all necessary authorizations following the BLM decision.

Public Scoping Process

This NOI initiates the scoping process, which guides development of the EIS. The scoping process encourages those who may be interested or affected by Lava Ridge to submit comments on resources and issues, impact-causing factors, reasonable alternatives and potential mitigation measures to be analyzed in the EIS. For information on how to submit comments, see the **ADDRESSES** section above. The BLM will hold public scoping meetings; the dates, locations, and times will be announced at least 15 days in advance through public notices, media releases and/or mailings.

The BLM will use the NEPA process to satisfy the public involvement requirements of Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. 306108) pursuant to 36 CFR 800.2(d)(3). Information about historic and cultural resources within the area potentially affected by Lava Ridge will be used to identify and evaluate impacts in the context of both NEPA and Section 106 of the NHPA. Federal agencies, Tribes, State and local governments, and other stakeholders interested in historic properties and cultural resources may request to participate in the Section 106 process as a Consulting Party. The BLM will continue consultation with Tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including potential impacts to cultural resources and treaty rights will be given due consideration.

Request for Identification of Potential Alternatives, Information, and Analyses Relevant to the Proposed Action

The BLM requests assistance with identifying potential alternatives to the Proposed Action. As alternatives should resolve a problem with the Proposed Action, please indicate the purpose of the suggested alternative. The BLM also

requests the identification of potential impacts that should be analyzed. Impacts should be a result of the action; therefore, please identify the activity along with the potential impact. Information that reviewers have that would assist in the development of alternatives or analysis of resources issues is also helpful.

Lead and Cooperating Agencies

The BLM Shoshone Field Office is the lead agency for this EIS. The following have agreed to participate in the environmental analysis of the Project as Cooperating Agencies: National Park Service, U.S. Army Corps of Engineers, the State of Idaho, Jerome, Lincoln, and Minidoka Counties in Idaho.

Decision Maker

Field Manager, Shoshone Field Office.

Nature of Decision To Be Made

The BLM will decide whether to grant, grant with conditions, or deny the application for a ROW. Pursuant to 43 CFR 2805.10, if the BLM issues a grant, the BLM decision maker may include terms, conditions, and stipulations determined to be in the public interest.

Segregation of Lands

On April 30, 2013, the BLM published a Final Rule, Segregation of Lands—Renewable Energy (78 FR 25204), that amended the regulations found in 43 CFR 2090 and 2800. The provisions of the Final Rule allow the BLM to temporarily segregate public lands within a solar or wind application area from the operation of the public land laws, including the Mining Law of 1872, by publication of a **Federal Register** notice. The BLM uses this temporary segregation authority to preserve its ability to approve, approve with modifications, or deny proposed ROWs, and to facilitate the orderly administration of the public lands, subject to valid existing rights. Licenses, permits, cooperative agreements, or discretionary land use authorizations of a temporary nature which would not impact lands identified in this NOI may be allowed with the approval of an authorized officer of the BLM during the segregation period. The lands segregated under this NOI are legally described as follows:

Boise Meridian, Idaho

- T. 7 S., R. 17 E.,
 Sec. 1, S $\frac{1}{2}$ SW $\frac{1}{4}$ and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 2, SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 12, NE $\frac{1}{4}$.
 T. 7 S., R. 18 E.,
 Sec. 6, lot 7, SE $\frac{1}{4}$ SW $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 7, lots 1 and 2, NE $\frac{1}{4}$, and E $\frac{1}{2}$ NW $\frac{1}{4}$;
 Sec. 8, N $\frac{1}{2}$ and N $\frac{1}{2}$ SE $\frac{1}{4}$;

Sec. 9, S $\frac{1}{2}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, and N $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 10, SW $\frac{1}{4}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, and S $\frac{1}{2}$;
 Sec. 11, NW $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 12, S $\frac{1}{2}$ SW $\frac{1}{4}$ and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 13, N $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, N $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 14, N $\frac{1}{2}$ NE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, and W $\frac{1}{2}$;
 Sec. 15, SE $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 21, SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 22, NE $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 23, NW $\frac{1}{4}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 24, E $\frac{1}{2}$ NE $\frac{1}{4}$, SW $\frac{1}{4}$ SW $\frac{1}{4}$, and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 25, NE $\frac{1}{4}$, N $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 26, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 27, W $\frac{1}{2}$ NW $\frac{1}{4}$;
 Sec. 28, E $\frac{1}{2}$ and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 33, N $\frac{1}{2}$ NE $\frac{1}{4}$ and NE $\frac{1}{4}$ NW $\frac{1}{4}$;
 Sec. 35, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$.
 T. 8 S., R. 18 E.,
 Sec. 1, lots 1 thru 4, S $\frac{1}{2}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 2, lots 1 thru 3, S $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$, and N $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 3, SW $\frac{1}{4}$ NW $\frac{1}{4}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 4, S $\frac{1}{2}$ NE $\frac{1}{4}$ and S $\frac{1}{2}$ NW $\frac{1}{4}$;
 Sec. 12, NE $\frac{1}{4}$ NE $\frac{1}{4}$;
 Sec. 24, E $\frac{1}{2}$ NE $\frac{1}{4}$ and E $\frac{1}{2}$ SE $\frac{1}{4}$.
 T. 6 S., R. 19 E.,
 Sec. 24, SE $\frac{1}{4}$ SW $\frac{1}{4}$;
 Sec. 25, E $\frac{1}{2}$ and E $\frac{1}{2}$ NW $\frac{1}{4}$.
 T. 7 S., R. 19 E.,
 Sec. 7, lots 7 and 8, SE $\frac{1}{4}$ SW $\frac{1}{4}$, and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 10, NE $\frac{1}{4}$ NE $\frac{1}{4}$;
 Sec. 11, lots 1 and 2, SW $\frac{1}{4}$ NE $\frac{1}{4}$, N $\frac{1}{2}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 12, lots 7 thru 9, SW $\frac{1}{4}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 13, N $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 14, NE $\frac{1}{4}$ and S $\frac{1}{2}$;
 Sec. 15, SW $\frac{1}{4}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, and S $\frac{1}{2}$;
 Sec. 17, N $\frac{1}{2}$, SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 18, lots 1 thru 8, NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 19, lots 1 thru 8 and NE $\frac{1}{4}$ NW $\frac{1}{4}$;
 Sec. 21, N $\frac{1}{2}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 22, N $\frac{1}{2}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 23, N $\frac{1}{2}$ NE $\frac{1}{4}$ and W $\frac{1}{2}$;
 Sec. 24, E $\frac{1}{2}$, N $\frac{1}{2}$ NW $\frac{1}{4}$, and SE $\frac{1}{4}$ SW $\frac{1}{4}$;
 Sec. 25, N $\frac{1}{2}$ NE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 26, SE $\frac{1}{4}$ NE $\frac{1}{4}$, N $\frac{1}{2}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 27, N $\frac{1}{2}$ NE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 28, S $\frac{1}{2}$ NW $\frac{1}{4}$ and SW $\frac{1}{4}$;
 Sec. 29, SE $\frac{1}{4}$ NE $\frac{1}{4}$ and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 30, lots 1 thru 8, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 31, lots 1 thru 8, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 32, E $\frac{1}{2}$ NE $\frac{1}{4}$;
 Sec. 33;
 Sec. 34, NE $\frac{1}{4}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, and S $\frac{1}{2}$;
 Sec. 35, N $\frac{1}{2}$ NE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, W $\frac{1}{2}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$.
 T. 8 S., R. 19 E.,
 Sec. 1, lots 1, 3, and 4, SE $\frac{1}{4}$ NE $\frac{1}{4}$, and SW $\frac{1}{4}$ NW $\frac{1}{4}$;
 Sec. 2;
 Sec. 3, lots 1 thru 4, S $\frac{1}{2}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$, N<

- Sec. 27, SE $\frac{1}{4}$ SW $\frac{1}{4}$ and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 32, NE $\frac{1}{4}$ SE $\frac{1}{4}$ and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 33, SW $\frac{1}{4}$;
 Sec. 34, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 35, NW $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 36, NW $\frac{1}{4}$ SW $\frac{1}{4}$.
- T. 6 S., R. 21 E.,
 Sec. 1, lots 1 thru 3, S $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 2, lot 4, SW $\frac{1}{4}$ NW $\frac{1}{4}$, and W $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 3, lots 1 thru 3, S $\frac{1}{2}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 4, lots 3 and 4, S $\frac{1}{2}$ NW $\frac{1}{4}$, and S $\frac{1}{2}$;
 Sec. 5, lots 1 and 2, S $\frac{1}{2}$ NE $\frac{1}{4}$, and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 8, E $\frac{1}{2}$ NE $\frac{1}{4}$ and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 9, NW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, and S $\frac{1}{2}$;
 Sec. 10, NE $\frac{1}{4}$ and S $\frac{1}{2}$;
 Sec. 11, W $\frac{1}{2}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 12, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 13, N $\frac{1}{2}$, SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 14, N $\frac{1}{2}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, and N $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 15, NE $\frac{1}{4}$ and N $\frac{1}{2}$ NW $\frac{1}{4}$;
 Sec. 17, NE $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 19, lots 5 thru 12, S $\frac{1}{2}$ NE $\frac{1}{4}$, and N $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 20, W $\frac{1}{2}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, and S $\frac{1}{2}$;
 Sec. 28, N $\frac{1}{2}$ SW $\frac{1}{4}$ and SE $\frac{1}{4}$;
 Sec. 29, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and NE $\frac{1}{4}$ SW $\frac{1}{4}$;
 Sec. 30, lots 2 and 3;
 Sec. 35, SE $\frac{1}{4}$ NW $\frac{1}{4}$ and NE $\frac{1}{4}$ SW $\frac{1}{4}$.
- T. 7 S., R. 21 E.,
 Sec. 6, lot 7;
 Sec. 7, lots 1 thru 3, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 8, SW $\frac{1}{4}$ SW $\frac{1}{4}$;
 Sec. 17, W $\frac{1}{2}$ NW $\frac{1}{4}$ and W $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 18, lots 1 thru 3, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 19, lot 4, NE $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 20, W $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 25, NE $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 26, S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 29, N $\frac{1}{2}$ and W $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 30, lots 1 and 2, E $\frac{1}{2}$, and E $\frac{1}{2}$ NW $\frac{1}{4}$;
 Sec. 31, lots 1 thru 4, NE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 32, SW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, and S $\frac{1}{2}$;
 Sec. 33, S $\frac{1}{2}$;
 Sec. 34, S $\frac{1}{2}$ SW $\frac{1}{4}$ and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 35, E $\frac{1}{2}$ and S $\frac{1}{2}$ SW $\frac{1}{4}$.
- T. 8 S., R. 21 E.,
 Sec. 1, lots 1 thru 4, S $\frac{1}{2}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 2, lots 1 thru 4, S $\frac{1}{2}$ SW $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 3, lots 1 thru 4, S $\frac{1}{2}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 4, lots 1 thru 4;
 Sec. 5, lots 1 thru 4, S $\frac{1}{2}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 6, lots 1 thru 5, lot 7, SE $\frac{1}{4}$ NE $\frac{1}{4}$, and SE $\frac{1}{4}$ NW $\frac{1}{4}$;
 Sec. 7, lots 1 thru 4, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and SE $\frac{1}{4}$ SW $\frac{1}{4}$;
 Sec. 8, W $\frac{1}{2}$ NE $\frac{1}{4}$, W $\frac{1}{2}$, and W $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 10, N $\frac{1}{2}$ NW $\frac{1}{4}$ and SE $\frac{1}{4}$ NW $\frac{1}{4}$;
 Sec. 11, S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 12, NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 13, E $\frac{1}{2}$ SW $\frac{1}{4}$ and SE $\frac{1}{4}$;
- Sec. 14, N $\frac{1}{2}$ NE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 15, SE $\frac{1}{4}$ NE $\frac{1}{4}$;
 Sec. 17, N $\frac{1}{2}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 18, lots 1 thru 4, N $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 19, lots 1 thru 4, E $\frac{1}{2}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, and W $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 20, NE $\frac{1}{4}$ and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 21, NW $\frac{1}{4}$ and S $\frac{1}{2}$;
 Sec. 22, S $\frac{1}{2}$ NE $\frac{1}{4}$ and SE $\frac{1}{4}$ NW $\frac{1}{4}$;
 Sec. 23, NE $\frac{1}{4}$, NE $\frac{1}{4}$ NW $\frac{1}{4}$, and S $\frac{1}{2}$ NW $\frac{1}{4}$;
 Sec. 24, N $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, and N $\frac{1}{2}$ NW $\frac{1}{4}$;
 Sec. 28, W $\frac{1}{2}$ and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 29, NE $\frac{1}{4}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 30, lots 1 thru 4, N $\frac{1}{2}$ NE $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, and W $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 31, lots 1 thru 3, NW $\frac{1}{4}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;
 Sec. 32, NE $\frac{1}{4}$;
 Sec. 33, NW $\frac{1}{4}$ NE $\frac{1}{4}$ and N $\frac{1}{2}$ NW $\frac{1}{4}$;
- T. 6 S., R. 22 E.,
 Sec. 32, lots 2 thru 4, N $\frac{1}{2}$ SW $\frac{1}{4}$, and NW $\frac{1}{4}$ SE $\frac{1}{4}$.
- T. 7 S., R. 22 E.,
 Sec. 3, lots 2 thru 4, SW $\frac{1}{4}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$, and W $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 5, S $\frac{1}{2}$;
 Sec. 6, lot 2, S $\frac{1}{2}$ NE $\frac{1}{4}$, and NE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 8;
 Sec. 9, SW $\frac{1}{4}$ NW $\frac{1}{4}$ and W $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 10, W $\frac{1}{2}$ NE $\frac{1}{4}$, W $\frac{1}{2}$, and W $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 14, S $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 15, W $\frac{1}{2}$ NE $\frac{1}{4}$, W $\frac{1}{2}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 17, N $\frac{1}{2}$, SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 19, SE $\frac{1}{4}$ SW $\frac{1}{4}$ and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 20, W $\frac{1}{2}$ NE $\frac{1}{4}$, W $\frac{1}{2}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 21, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 22, N $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 23, W $\frac{1}{2}$;
 Sec. 26, W $\frac{1}{2}$;
 Sec. 27, E $\frac{1}{2}$ NE $\frac{1}{4}$, W $\frac{1}{2}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 28, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, and S $\frac{1}{2}$ SW $\frac{1}{4}$;
 Sec. 29;
 Sec. 30, lots 1, 2, and 4, E $\frac{1}{2}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and E $\frac{1}{2}$ SW $\frac{1}{4}$;
 Secs. 31 thru 33;
 Sec. 34, N $\frac{1}{2}$, SW $\frac{1}{4}$, and E $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 35, N $\frac{1}{2}$ NE $\frac{1}{4}$ and W $\frac{1}{2}$.
- T. 8 S., R. 22 E.,
 Sec. 3, lot 4;
 Secs. 4 thru 7;
 Sec. 8, N $\frac{1}{2}$ and SW $\frac{1}{4}$;
 Sec. 17, W $\frac{1}{2}$;
 Sec. 18, lots 1, 2, and 4, N $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, and S $\frac{1}{2}$ SE $\frac{1}{4}$;
 Sec. 19, lots 1 thru 4, N $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$;
 Sec. 20, W $\frac{1}{2}$.

The areas described aggregate 106,555.88 acres, according to the official plats of the surveys of the said lands, on file with the BLM.

To process the ROW application on the above lands, the BLM is segregating the land under the authority in 43 CFR 2091.3–2 and 43 CFR 2804.25(f)(1), for a period of up to two years, subject to valid existing rights. This two-year segregation period will commence on August 20, 2021. The public land involved in this closure will be segregated from appropriation under the public land and mining laws, but not the mineral leasing or material sale laws. It has been determined that this segregation is necessary for the orderly administration of the public land.

The segregation period will terminate and the land will automatically reopen to appropriation under the public land laws, including the mining laws, if one of the following events occurs: (1) Upon the issuance of a decision by the authorized officer granting, granting with modifications, or denying the application for a ROW; (2) Upon publication of a **Federal Register** notice terminating the segregation; or (3) Without further administrative action at the end of the segregation provided for in the **Federal Register** notice initiating the segregation, whichever occurs first. Any segregation made under this authority is effective for two years and may be extended by the BLM Idaho State Director for up to two years through the issuance of a **Federal Register** notice explaining the reasons for an extension. Segregations under 43 CFR 2804.25(f)(3) may only be extended once and the total segregation period may not exceed four years. Upon termination of segregation, all lands subject to this segregation will automatically reopen to appropriation under the public land laws.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Authority: 42 U.S.C. 4321 *et seq.*, 40 CFR 1501.9, 43 CFR 2091.3–2, and 43 CFR 2804.25(f).

Michael C. Courtney,

District Manager, Twin Falls District.

[FR Doc. 2021–17920 Filed 8–19–21; 8:45 am]

BILLING CODE 4310–GG–P



Date: Thursday, August 19, 2021
Contact: Interior_Press@ios.doi.gov

Share

Interior Department Announces Next Steps for Idaho Onshore Wind Energy Project

WASHINGTON — The Department of the Interior announced today that the Bureau of Land Management (BLM) is seeking public input on a commercial-scale wind energy facility that is proposed to be constructed on BLM-managed public land in southern Idaho, approximately 25 miles northeast of Twin Falls. The Lava Ridge Wind Energy Project has the potential to generate 1,000 megawatts of wind energy.

“Renewable wind projects are a critical component of the Biden-Harris administration’s commitment to confronting climate change, promoting clean air and water for our current and future generations, creating thousands of good-paying union jobs, and jump starting our country’s transition to a clean energy future,” said **Secretary Deb Haaland**. “At the Interior Department, we are doing our part to ensure these projects are done thoughtfully and avoid impacts to surrounding communities. The Department is committed to public input and meaningful Tribal consultation to uphold our trust and treaty responsibilities.”

The Biden-Harris administration has committed to increase renewable energy production on public lands and waters, including a target goal of permitting at least 25 gigawatts of onshore renewable energy by 2025. In the last month, the BLM has made progress on more than 2,600MW of renewable energy, including the opening of the public comment periods on draft Environmental Assessments for four solar projects in California and Arizona, and Decision Records for a project in Utah.

The Department is continuing to make progress in developing a robust and sustainable clean energy economy, including partnering with other federal agencies to increase renewable energy production on public lands and waters. Interior is undertaking these goals with broad stakeholder engagement, including Tribal nations, states, local officials, agricultural landowners, outdoor enthusiasts, and others to identify strategies and goals that reflect the priorities of all communities.

The BLM is proposing that 73,000 acres of public lands be temporarily set aside from consideration of any land sale or new mining claim proposals for two years. This is to facilitate the orderly administration of the public land as the BLM considers the Lava Ridge Wind Project proposal.

The BLM is seeking public comments on issues, planning criteria, concerns, potential impacts, alternatives, and mitigation measures that the agency should consider in analyzing the proposed Lava Ridge Wind Project. The BLM will hold public meetings to provide information on the proposed project and to explain the Environmental Impact Statement development process as follows:

- Wednesday, Sept. 8, 2021 at 2:00 p.m. MDT
- Thursday, Sept. 9, 2021 at 6:00 p.m. MDT

Both meetings will be virtual. Please visit BLM's Lava Ridge Wind Project webpage and click on *How To Get Involved* for information on registration.

###

This year, we invite everyone to reimagine your public lands as we celebrate 75 years of the BLM's stewardship and service to the American people. The BLM manages approximately 245 million acres of public land located primarily in 12 Western states, including Alaska. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. The agency's mission is to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations.



U.S. Department of the Interior
Bureau of Land Management

FOR IMMEDIATE RELEASE

Sept. 13, 2021

Contact: Heather Tiel-Nelson

hnelson@blm.gov

(208) 736-2352

Bureau of Land Management extends public scoping period on proposed wind energy project

SHOSHONE, Idaho – The Bureau of Land Management is seeking public input on a commercial-scale wind energy facility that is proposed to be constructed on BLM-managed public land in southern Idaho, approximately 25 miles northeast of Twin Falls. Magic Valley Energy LLC, an affiliate of LS Power, is seeking authorization to construct the Lava Ridge Wind Energy Project on 73,000 acres of public land in Jerome, Lincoln and Minidoka counties. The project has the potential to generate 1,000 megawatts of wind energy.

Following two widely attended virtual public scoping meetings, the Shoshone Field Office plans to extend the public scoping period by 30 days, accepting public input until Oct. 20, 2021. According to Shoshone Field Manager Codie Martin, “It is critically important to us that we respond to the concerns that we heard during our initial public meetings. We want to provide enough time for all of the issues, potential impacts, alternatives, and mitigation measures to be brought forward,” he said. “We are still in the very early stage of the analysis process, so we would encourage those interested in this project to provide information they believe we need to consider.”

The proposed Lava Ridge Wind Energy Project includes up to 400 wind energy generating turbines, up to seven new substations, approximately 198 miles of 34.5 kilovolt (kV) collector lines, 34 miles of 230 kV transmission lines, 18 miles of 500 kV transmission lines, 381 miles of access roads, 47 miles of temporary crane walk paths, a battery energy storage system, three operations and maintenance facilities, five permanent meteorological towers, and construction-related staging yards. The proposed project’s planned 500 kV transmission line would interconnect at the existing Idaho Power Midpoint substation approximately seven miles south of Shoshone or at an alternative location along the permitted, but not yet constructed, Southwest Intertie Project – Northern Portion.

Comments can be submitted in the following ways:

- Electronically via the BLM Land Use Planning and National Environmental Policy Act Register: Navigate to <https://go.usa.gov/xFKXg> and click on the “Participate Now” button to the right of the document link. Enter your comment and information, then click “Submit”
- E-mail comments to BLM_ID_LavaRidge@blm.gov
- Mail comments to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352

For more information contact Kasey Prestwich, Shoshone BLM Project Manager, at 208-732-7204, kprestwich@blm.gov, or see the Lava Ridge Wind Project BLM Land Use Planning and National Environmental Policy Act Register above.

Those who provide comments are advised that before including their address, phone number, e-mail address, or other personal identifying information, they should be aware that the entire comment – including personal identifying information – may be made publicly available at any time. While those commenting can ask in their comments to have their personal identifying information withheld from public review, the BLM cannot guarantee that they will be able to do so.

- BLM –

This year, we invite everyone to reimagine your public lands as we celebrate 75 years of the BLM's stewardship and service to the American people. The BLM manages approximately 245 million acres of public land located primarily in 12 Western states, including Alaska. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. The agency's mission is to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations.

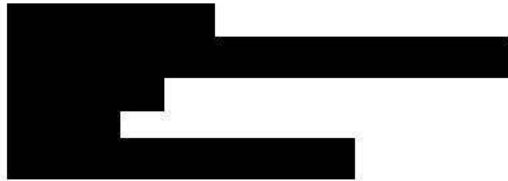


United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Shoshone Field Office
400 West F Street
Shoshone, Idaho 83352-5284
(208) 732-7200



In Reply Refer To:
2830/IDI-39174

August 23, 2021



Dear [REDACTED]:

The Bureau of Land Management (BLM) Shoshone Field Office cordially invites you to participate in the public scoping process for the proposed Lava Ridge Wind Project (Project). Public scoping is the first step in the preparation of an Environmental Impact Statement (EIS) for any project under a federal nexus under the National Environmental Policy Act. The public scoping process is designed to introduce the proposed project to the public and solicit comments on what the BLM and Cooperating Agencies should consider in the EIS analysis. It also provides an opportunity to solicit the public's input on potential effects to historic properties under Section 106 of the National Historic Preservation Act. The scoping period is from August 20 to September 20, 2021. You may submit comments at any time during the preparation of the EIS; however, if you would like to have your comment(s) considered for inclusion in the Draft EIS, comments must be postmarked by September 20, 2021.

Due to agency concerns regarding the recent uptick in cases of COVID-19, public scoping meetings will be virtual (online). Two virtual meetings will be held during the scoping period to introduce and describe the project to the public and provide opportunities for participants to ask questions. You are invited to attend any of the public scoping meetings listed below:

Wednesday, September 8, 2021, 2:00 – 3:00 PM MDT

Link to preregister: https://us02web.zoom.us/webinar/register/WN_0VtuiJ5GR0qD1kjkjX2xWA

Thursday, September 9, 2021, 6:00 – 7:00 PM MDT

Link to preregister: https://us02web.zoom.us/webinar/register/WN_S-xxX4h0StizbVJVGTtR2g

The webinars will include a pre-recorded presentation and a question-and-answer period.

The BLM received a right-of-way application from Magic Valley Energy, LLC (MVE) on February 26, 2020. MVE seeks authorization to use federal lands to construct, operate, maintain, and eventually decommission the project. As proposed, the project includes up to 400 wind energy generating turbines, up to seven new substations, approximately 198 miles of 34.5 kilovolt (kV) collector lines, 34 miles of 230 kV transmission lines, 18 miles of 500 kV transmission lines, 358 miles of access roads, 47 miles of temporary crane paths, a battery energy storage system, three operations and maintenance facilities, five permanent met towers, and construction-related staging yards. Engineering is preliminary, but the turbines may have a maximum height (including the rotor) of up to 740 feet.

The proposed project is located primarily on public lands administered by BLM Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within the Idaho counties of Jerome, Lincoln, and Minidoka. Private and State of Idaho-owned parcels may be adjacent to or part of the proposed project area. The project's planned 500 kilovolt (kV) transmission line may interconnect at the existing Idaho Power Midpoint substation approximately 7 miles south of Shoshone, or at an alternative location inside the right-of-way corridor for the not yet constructed, Southwest Intertie Project – Northern Portion (SWIP-North). More information is available on the BLM's E-Planning website at <https://go.usa.gov/xFKXg>.

The BLM is seeking your input on information, analysis, and perspectives on resources and issues, impact-causing factors, reasonable alternatives, and potential mitigation measures to be analyzed in the EIS. You may submit your comments by any of the following methods:

- Through the BLM's E-Planning.gov web portal. Navigate to <https://go.usa.gov/xFKXg> and click on the "Participate Now" button to the right of the document link. Enter your comment and information, then click "Submit."
- Submit your comments electronically via email by sending them to **BLM ID LavaRidge@blm.gov**; or
- Mail comments to Lava Ridge Wind Project, c/o Kasey Prestwich, BLM Shoshone Field Office, 400 West F Street; Shoshone, ID 83352-5284.

If you have any questions about this project, please contact Kasey Prestwich, BLM Project Manager, at 208-732-7204 or kprestwich@blm.gov. If you require special accommodations for any of the scoping meetings, please contact Jo Render at Galileo Project, LLC at jo.render@galileoaz.com or 480-629-4705, ext. 106.

We appreciate your participation in this proposed project.

Sincerely,

CODIE MARTIN

Digitally signed by CODIE MARTIN
Date: 2021.08.12 10:54:45 -06'00'

Codie Martin
Field Manager



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Shoshone Field Office
400 West F Street
Shoshone, Idaho 83352-5284
(208) 732-7200



In Reply Refer To:
2830/IDI-39174

August 23, 2021

Dear Interested Party:

The Bureau of Land Management (BLM) Shoshone Field Office cordially invites you to participate in the public scoping process for the proposed Lava Ridge Wind Project (Project). Public scoping is the first step in the preparation of an Environmental Impact Statement (EIS) for any project under a federal nexus under the National Environmental Policy Act. The public scoping process is designed to introduce the proposed project to the public and solicit comments on what the BLM and Cooperating Agencies should consider in the EIS analysis. It also provides an opportunity to solicit the public's input on potential effects to historic properties under Section 106 of the National Historic Preservation Act. The scoping period is from August 20 to September 20, 2021. You may submit comments at any time during the preparation of the EIS; however, if you would like to have your comment(s) considered for inclusion in the Draft EIS, comments must be postmarked by September 20, 2021.

Due to agency concerns regarding the recent uptick in cases of COVID-19, public scoping meetings will be virtual (online). Two virtual meetings will be held during the scoping period to introduce and describe the project to the public and provide opportunities for participants to ask questions. You are invited to attend any of the public scoping meetings listed below:

Wednesday, September 8, 2021, 2:00 – 3:00 PM MDT

Link to preregister: https://us02web.zoom.us/webinar/register/WN_0VtuiJ5GR0qD1kjkjX2xWA

Thursday, September 9, 2021, 6:00 – 7:00 PM MDT

Link to preregister: https://us02web.zoom.us/webinar/register/WN_S-xxX4h0StizbVJVGTtR2g

The webinars will include a pre-recorded presentation and a question-and-answer period.

The BLM received a right-of-way application from Magic Valley Energy, LLC (MVE) on February 26, 2020. MVE seeks authorization to use federal lands to construct, operate, maintain, and eventually decommission the project. As proposed, the project includes up to 400 wind energy generating turbines, up to seven new substations, approximately 198 miles of 34.5 kilovolt (kV) collector lines, 34 miles of 230 kV transmission lines, 18 miles of 500 kV transmission lines, 381 miles of access roads, 47 miles of temporary crane paths, a battery energy storage system, three operations and maintenance facilities, five permanent met towers, and construction-related staging yards. Engineering is preliminary, but the turbines may have a maximum height (including the rotor) of up to 740 feet.

The proposed project is located primarily on public lands administered by the BLM Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within the Idaho counties of Jerome, Lincoln, and Minidoka. Private and State of Idaho-owned parcels may be adjacent to or part of the proposed project area. The project's planned 500 kilovolt (kV) transmission line may interconnect at the existing Idaho Power Midpoint substation approximately 7 miles south of Shoshone, or at an alternative location inside the right-of-way corridor for the not yet constructed, Southwest Intertie Project – Northern Portion (SWIP-North). More information is available on the BLM's E-Planning website at <https://go.usa.gov/xFKXg>.

The BLM is seeking your input on information, analysis, and perspectives on resources and issues, impact-causing factors, reasonable alternatives, and potential mitigation measures to be considered in the EIS. You may submit your comments by any of the following methods:

- Through the BLM's E-Planning.gov web portal. Navigate to <https://go.usa.gov/xFKXg> and click on the "Participate Now" button to the right of the document link. Enter your comment and information, then click "Submit."
- Submit your comments electronically via email by sending them to BLM_ID_LavaRidge@blm.gov; or
- Mail comments to Lava Ridge Wind Project, c/o Kasey Prestwich, BLM Shoshone Field Office, 400 West F Street; Shoshone, ID 83352-5284.

If you have any questions about this project, please contact Kasey Prestwich, BLM Project Manager, at 208-732-7204 or kprestwich@blm.gov. If you require special accommodations for any of the scoping meetings, please contact Jo Render at Galileo Project, LLC at jo.render@galileoaz.com or 480-629-4705, ext. 106.

We appreciate your participation in this proposed project.

Sincerely,

CODIE MARTIN

Digitally signed by CODIE
MARTIN
Date: 2021.08.12 10:55:39 -06'00'

Codie Martin
Field Manager



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Shoshone Field Office
400 West F Street
Shoshone, Idaho 83352-5284
(208) 732-7200



In Reply Refer To:
2800
IDI-39174

SEP 15 2021



Dear [REDACTED]

The Bureau of Land Management (BLM) Shoshone Field Office has extended the scoping period for the proposed Lava Ridge Wind Project (Project) Environmental Impact Statement (EIS). Public scoping is the first step in the preparation of an EIS for any project under the National Environmental Policy Act. The public scoping process is designed to introduce the proposed project to the public and solicit comments on what the BLM and Cooperating Agencies should consider in the EIS analysis. It also provides an opportunity to solicit the public's input on potential effects to historic properties under Section 106 of the National Historic Preservation Act.

The scoping period has been extended to October 20, 2021. You may submit comments at any time during the preparation of the EIS, and all comments received will be included in the project record. However, in order for your input to be considered as the Draft EIS is prepared, your comments need to be submitted prior to the end of the extended scoping period.

The BLM received a right-of-way application from Magic Valley Energy, LLC (MVE) on February 26, 2020. MVE seeks authorization to use federal lands to construct, operate, maintain, and eventually decommission the project. The proposed project is located primarily on public lands administered by the BLM Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within the Idaho counties of Jerome, Lincoln, and Minidoka. Private and State of Idaho-owned parcels may be adjacent to or part of the proposed project area.

As proposed, the project includes up to 400 wind energy generating turbines, up to seven new substations, approximately 250 miles of collector and transmission lines, 381 miles of access roads, 47 miles of temporary crane paths, a battery energy storage system, three operations and maintenance facilities, five permanent met towers, and construction-related staging yards. Engineering is preliminary, but the turbines may have a maximum height (including the rotor) of up to 740 feet. More information about the project is available on the BLM's E-Planning website at <https://go.usa.gov/xFKxg>.

The BLM is seeking your input on information, analysis, and perspectives on resources and issues, impact-causing factors, reasonable alternatives, and potential mitigation measures to be analyzed in the EIS. You may submit your comments by any of the following methods:

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If you have any questions about the Lava Ridge Wind Project EIS, please contact Kasey Prestwich, BLM Project Manager, at 208-732-7204 or kprestwich@blm.gov.

We appreciate your participation in this proposed project.

Sincerely,

CODIE MARTIN Digitally signed by CODIE MARTIN
Date: 2021.09.15 07:27:17 -06'00'

Codie Martin
Field Manager



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Shoshone Field Office
400 West F Street
Shoshone, Idaho 83352-5284
(208) 732-7200



In Reply Refer To:
2800
IDI-39174

SEP 15 2021

Dear Stakeholders and Interested Parties:

The Bureau of Land Management (BLM) Shoshone Field Office has extended the scoping period for the proposed Lava Ridge Wind Project (Project) Environmental Impact Statement (EIS). Public scoping is the first step in the preparation of an EIS for any project under the National Environmental Policy Act. The public scoping process is designed to introduce the proposed project to the public and solicit comments on what the BLM and Cooperating Agencies should consider in the EIS analysis. It also provides an opportunity to solicit the public's input on potential effects to historic properties under Section 106 of the National Historic Preservation Act.

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We appreciate your participation in this proposed project.

Sincerely,

CODIE MARTIN Digitally signed by CODIE MARTIN
Date: 2021.09.15 07:27:17 -06'00'

Codie Martin
Field Manager



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Shoshone Field Office
400 West F Street
Shoshone, Idaho 83352-5284
(208) 732-7200



In Reply Refer To:
2800
IDI-39174

SEP 30 2021

Dear Stakeholders and Interested Parties:

The Bureau of Land Management (BLM) Shoshone Field Office has extended the scoping period for the proposed Lava Ridge Wind Project (Project) Environmental Impact Statement (EIS). Public scoping is the first step in the preparation of an EIS for any project under the National Environmental Policy Act. The public scoping process is designed to introduce the proposed project to the public and solicit comments on what the BLM and Cooperating Agencies should consider in the EIS analysis. It also provides an opportunity to solicit the public's input on potential effects to historic properties under Section 106 of the National Historic Preservation Act.

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We appreciate your participation in this proposed project.

Sincerely,

CODIE MARTIN

Digitally signed by CODIE MARTIN
Date: 2021.09.15 07:27:17 -06'00'

Codie Martin
Field Manager



Bureau of Land Management Public Scoping Meetings for the Lava Ridge Wind Project

The Bureau of Land Management would like your participation in the proposed Lava Ridge Wind Project scoping process.

Magic Valley Energy, LLC (MVE) is seeking authorization to use federal lands for constructing, operating, maintaining, and decommissioning the Lava Ridge Wind Project. The proposed project includes up to 400 wind energy generating turbines, up to seven new substations, approximately 198 miles of 34.5 kilovolt (kV) collector lines, 34 miles of 230 kV transmission lines, 18 miles of 500 kV transmission lines, 381 miles of access roads, 47 miles of temporary crane walk paths, a battery energy storage system, three operations and maintenance facilities, five permanent met towers, and construction-related staging yards. Engineering is preliminary, but the turbines may have a maximum height (including the rotor) of up to 740 feet.

The proposed project is located primarily on public lands administered by the Bureau of Land Management (BLM) Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within the Idaho counties of Jerome, Lincoln, and Minidoka. MVE has proposed to locate all components of the project within a series of corridors. These corridors are approximately 1/2 mile wide and cover approximately 76,000 acres, of which 73,000 acres are located on public lands managed by the BLM and 3,000 acres are state lands managed by the Idaho Department of Lands.

The project's planned 500 kV transmission line may interconnect at the existing Idaho Power Midpoint substation approximately 7 miles south of Shoshone, Idaho, or at an alternative location inside the right-of-way corridor for the not yet constructed Southwest Intertie Project – Northern Segment.

How to Provide a Comment

Comments must be postmarked by September 20, 2021

Online: <https://go.usa.gov/xFKxg> and click on "Participate Now"

Email: BLM_ID_LavaRidge@blm.gov

Mail: Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street, Shoshone, ID 83352

Scoping Meeting Dates/Times and Registration

September 8, 2021, 2:00 – 3:00pm MDT

Click to register: [BLM Lava Ridge Wind Project Public Scoping Meeting-Sept 8](#)

September 9, 2021, 6:00 – 7:00pm MDT

Click to register: [BLM Lava Ridge Wind Project Public Scoping Meeting-Sept 9](#)

Galileo Project LLC | 4700 S McClintock Dr, Suite 100, Tempe, AZ 85282

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Lava Ridge Wind Project

Public Scoping Meeting

REMINDER

Bureau of Land Management Public Scoping Meetings for the Lava Ridge Wind Project

The Bureau of Land Management would like your participation in the proposed Lava Ridge Wind Project scoping process.

Magic Valley Energy, LLC (MVE) is seeking authorization to use federal lands for constructing, operating, maintaining, and decommissioning the Lava Ridge Wind Project. The proposed project includes up to 400 wind energy generating turbines, up to seven new substations, approximately 198 miles of 34.5 kilovolt (kV) collector lines, 34 miles of 230 kV transmission lines, 18 miles of 500 kV transmission lines, 381 miles of access roads, 47 miles of temporary crane walk paths, a battery energy storage system, three operations and maintenance facilities, five permanent met towers, and construction-related staging yards. Engineering is preliminary, but the turbines may have a maximum height (including the rotor) of up to 740 feet.

The proposed project is located primarily on public lands administered by the Bureau of Land Management (BLM) Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within the Idaho counties of Jerome, Lincoln, and Minidoka. MVE has proposed to locate all components of the project within a series of corridors. These corridors are approximately 1/2 mile wide and cover approximately 76,000 acres, of which 73,000 acres are located on public lands managed by the BLM and 3,000 acres are state lands managed by the Idaho Department of Lands.

The project's planned 500 kV transmission line may interconnect at the existing Idaho Power Midpoint substation approximately 7 miles south of Shoshone, Idaho, or at an alternative location inside the right-of-way corridor for the not yet constructed Southwest Intertie Project – Northern Segment.

How to Provide a Comment

Comments must be postmarked by September 20, 2021

Online: <https://go.usa.gov/xFKxg> and click on "Participate Now"

Email: BLM_ID_LavaRidge@blm.gov

Mail: Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street, Shoshone, ID 83352

Scoping Meeting Dates/Times and Registration

September 8, 2021, 2:00 – 3:00pm MDT

Click to register: [BLM Lava Ridge Wind Project Public Scoping Meeting-Sept 8](#)

September 9, 2021, 6:00 – 7:00pm MDT

Click to register: [BLM Lava Ridge Wind Project Public Scoping Meeting-Sept 9](#)

Galileo Project LLC | 4700 S McClintock Dr, Suite 100, Tempe, AZ 85282

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EXTENSION

Bureau of Land Management Public Scoping for the Lava Ridge Wind Project

The scoping period for the Lava Ridge Wind Project Environmental Impact Statement (EIS) has been extended to **October 20, 2021**. The Bureau of Land Management (BLM) invites your participation in the scoping process for the EIS. The scoping process also provides an opportunity to provide input on potential effects to historic properties under Section 106 of the National Historic Preservation Act.

Magic Valley Energy, LLC is seeking authorization to use federal lands for constructing, operating, maintaining, and decommissioning the Lava Ridge Wind Project. The proposed project is located primarily on public lands administered by the BLM's Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within the Idaho counties of Jerome, Lincoln, and Minidoka. Further information about the project is available on the BLM's project website at <https://go.usa.gov/xFKXg>.

The BLM thanks everyone who attended the public scoping meetings held on September 8 and 9, 2021. The prerecorded presentation and scoping posters are available on the project website at <https://go.usa.gov/xFKXg>.

Interested parties are encouraged to provide written comments prior to the end of the extended scoping period so that they can be fully considered in the preparation of the Draft EIS. If you have questions about the project and need further information or clarification prior to submitting a comment, please contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager, Phone: 208-732-7204, E-mail: kprestwich@blm.gov.

How to Provide a Comment

Effective comments address one or more of the following:

Resources likely to be affected by the project;
Potential resource issues that should be analyzed;
Data sources that the agency may not be aware of; and/or
Reasonable alternatives to be considered in the analysis.

You can submit your comments in three ways:

Online: <https://go.usa.gov/xFKxg> and click on "Participate Now"

Email: BLM_ID_LavaRidge@blm.gov

Mail: Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street, Shoshone, ID 83352

Galileo Project LLC | 4700 S McClintock Dr, Suite 100, Tempe, AZ 85282

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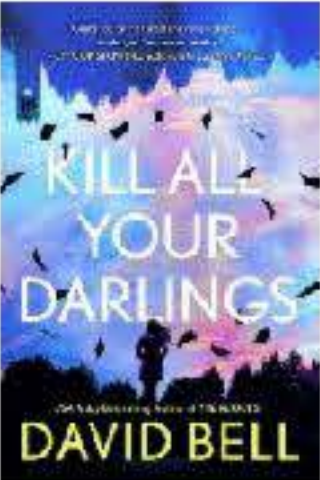
APPENDIX B

Paid Display Advertisements

Family tragedies propel two new 'whodunit' novels

MYSTERIOUS CIRCUMSTANCES

‘Kill All Your Darlings’ By David Bell (Berkley, \$17)



The title of David Bell's 11th stand-alone novel refers to advice well known to every writer. Sometimes the seemingly perfect word or sentence just will not work and has to be sacrificed for the greater good. "Kill All Your Darlings" delivers the near-perfect metaphor for this energetic story that looks at plagiarism, the writing life and grief in a tidy, highly suspenseful plot.

Bell explores all the tenets of the academic mystery — the pressure to publish or perish to gain tenure, thinly veiled jealousy over a colleague's success, backbiting and gossip as currency.

Connor Nye, an English professor at Kentucky's Commonwealth University, has never recovered from the death of his wife and 15-year-old son in a freak accident five years before. He is chronically late to his classes, unprepared to teach, drinks too much and has been unable to work on that novel. Despite rendered truly moribund by grief, Connor gives the im-

pression that he has always taken the easy way out — not so much lazy as suffering from inertia.

That is, until an opportunity popped up when his prize student, Madeline O'Brien, turned in a wonderful manuscript for a novel that, because her computer was broken, was handwritten. Two days later, Madeline disappeared, presumed dead.

Connor typed up the manuscript, making changes along the way and, to his surprise, finally secured a publishing contract. What could go wrong? How about Madeline showing up at Connor's home on the night of his first book signing, demanding to be paid for what is really her novel. Then the police show up, wondering why details in Connor's crime thriller are so similar to the murder of a local woman several years ago.

Bell delivers a gripping, intelligent story that seamlessly pulls together several plot tendrils, from Madeline's initial disappearance and why she is so frightened to investigations into an old murder and a more recent one.

"Kill All Your Darlings" shows how Connor moves from being someone who never finished anything, nearly swallowed up by his dark days, to a decisive man who may have a future, if he can get past that little bout with plagiarism.

‘Her Last Breath’ By Hilary Davidson (Thomas & Mercer, \$24.95)



Family dynamics and miscommunication fuel the intriguing family drama "Her Last Breath," the second standalone novel by two-time Anthony Award-winner Hilary Davidson.

Two sisters with drastically different lives form the heart of "Her Last Breath." A tattooed loner who lives in a down-market Brooklyn apartment, Deirdre Crawley barely makes a living delivering and arranging the packages for upscale clients too busy to put their spices in a cupboard. Her well-liked sister Caroline "Caro" Thraxton married well, lives on the Upper East Side, has a satisfying career as director of public relations for her in-laws' upscale hotel company and an adorable 4-year-old son.

Deirdre hasn't spoken to her sister for a while, unable to forgive Caro for keep-

ing in touch with their father with whom Deirdre is estranged. Deirdre is unprepared for the depth of her grief when Caro dies unexpectedly while on a run. Grief turns to revenge when she receives a postdated email from Caro, saying that if she dies, her husband Theo is to blame, and that he killed his first wife.

Davidson's punchy writing and affinity for characters propel "Her Last Breath," as Deirdre becomes involved with Theo's hateful sister and his mercurial father with a seemingly pleasant demeanor. Davidson is careful to make each character three-dimensional, not allowing any one of them to be a full-fledged villain. This is especially true of Theo, who shows a quick temper but also a willingness to look into his own past.

As her investigation continues, Deirdre examines why she thrives on confrontation, but Caro avoided it. "I'd seen Caro's unvarnished truths about our family. Nothing could have prepared me for that." The brisk plot seamlessly moves from New York neighborhoods to Berlin, Germany.

— Oline H. Cogdill, South Florida Sun Sentinel

KOHLER Walk-In Bath

Safety Meets Style

Design Your Dream Bath & Save

50% OFF

Professional Installation of Your KOHLER Walk-In Bath®

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*Offer ends August 31, 2021. Participating dealers only. Not available in AK, HI, Nassau City, Suffolk City, Westchester City, or City of Buffalo, NY. 50% off installation labor applies to the installation of the Walk-In Bath and may exclude costs associated with plumbing and electrical. Cannot be combined with any other advertised offer. Contact local dealer for financing details. *Subject to credit approval. Interest is billed during the promotional period but all interest is waived if the purchase amount is paid before the expiration of the promotional period. There is no minimum monthly payment required during the promotional period. Financing for GreenSky® consumer loan programs is provided by federally insured, equal opportunity lender banks. NMLS #1416362. GreenSky® Program is a program name for certain consumer credit plans extended by participating lenders to borrowers for the purchase of goods and/or services from participating merchants. Participating lenders are federally insured, equal opportunity lender banks. GreenSky® is a registered trademark of GreenSky, LLC. GreenSky Servicing, LLC services the loans on behalf of participating lenders. NMLS #1416362. GreenSky® financing offers available at participating dealers only.

PUBLIC SCOPING MEETINGS

Bureau of Land Management

LAVA RIDGE WIND PROJECT

PUBLIC MEETINGS

Due to agency concerns regarding the recent uptick in cases of COVID-19, public scoping meetings will be virtual (online).

VIRTUAL PUBLIC MEETINGS
Wednesday, September 8, 2021
2:00-3:00pm MDT

Thursday, September 9, 2021
6:00-7:00pm MDT

Go to <https://go.usa.gov/xFKXg>, How to Get Involved, for information on registration.

Please submit comments by **September 20, 2021** for consideration in the draft EIS.

HOW TO SUBMIT COMMENTS

Mail:
Lava Ridge Wind Project
BLM Shoshone Field Office
400 West F Street
Shoshone, ID 83352

Email:
BLM_ID_LavaRidge@blm.gov

Project Website:
Visit <https://go.usa.gov/xFKXg> and click on the "Participate Now" button.

Please submit comments by **September 20, 2021** for consideration in the draft EIS.

If you require special accommodations for the meeting, please contact Jo Renter at Galileo Project, LLC, by email Jo.Renter@galileoaz.com, by telephone 480-629-4705, extension 106.

APPENDIX C

Scoping Meeting Materials

How can I participate in the EIS and scoping process and stay informed?

- Attend the virtual scoping meetings to learn more about the project and ask questions.
- Visit the BLM's project website <https://go.usa.gov/xFKxg>. Click on the "Participate Now" button to the right of the document link.
- Sign up for the project mailing list to receive project updates or submit comments by emailing: BLM_ID_LavaRidge@blm.gov
- Mail comments to: Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- For more information regarding the public scoping meetings or the proposed project, contact Kasey Prestwich, phone 208-732-7204, email kprestwich@blm.gov.

Due to agency concerns regarding the recent uptick in cases of COVID-19, public scoping meetings will be virtual (online).

How to Comment Effectively

Your participation is an important part of the decision-making process. We need your feedback to identify issues that may occur if the project moves forward. To make the best use of your input, here are some points to consider when making a comment about the project:

- Keep your comments focused on the proposed project and what is being analyzed.
- Think about concerns you have about the impacts the project may have, and explain them in detail.
- Make sure you submit your comments within the timeframe announced. This ensures the BLM will have all concerns documented for use in the EIS.

Comments must be postmarked by September 20, 2021.

The most effective comments are those that provide useful information to the agencies. Comments made during scoping or on the EIS are not counted as votes or as a part of a referendum on the BLM's decision.

- They are used to improve the document and analyses to adequately determine environmental impacts before the BLM makes final decisions on the proposed project.
- Avoid comments that state, "I am in favor of this project," or "I am opposed to this project."
- Comments should focus on identifying potentially affected resources, potential resource issues that should be analyzed, and data sources that the agency may not be aware of.
- Remember that the more clear, concise, and relevant to the project your comments are, the more effective and useful they will be in improving the EIS and affecting the BLM's decision.



Virtual Meetings

September 8, 2021
2:00 – 3:00pm (MDT)
Pre-register here:
https://us02web.zoom.us/webinar/register/WN_0VtuiJ5GR0qD1kjkjX2xWA

September 9, 2021
6:00 – 7:00pm (MDT)
Pre-register here:
https://us02web.zoom.us/webinar/register/WN_S-xxX4h0StizbVJVGTtR2g



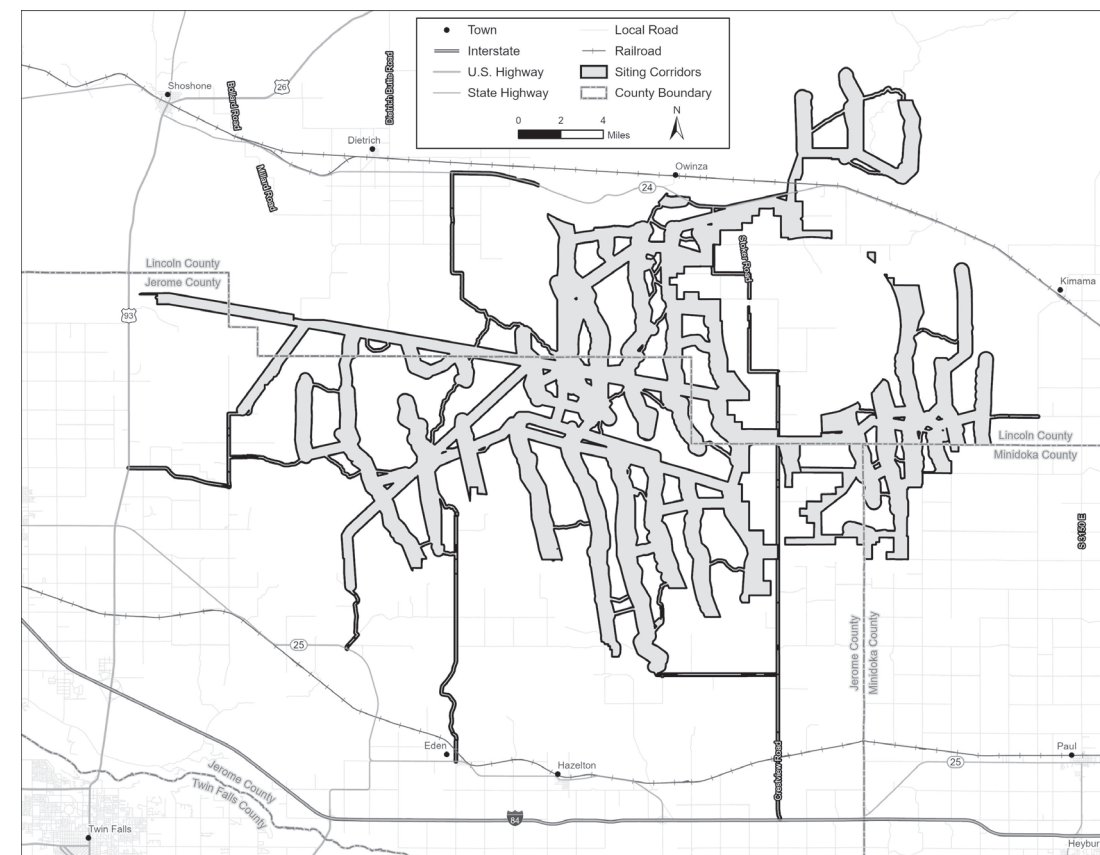
Lava Ridge Wind Project

Scoping Information

Magic Valley Energy, LLC (MVE) is seeking authorization to use federal lands for constructing, operating, maintaining, and decommissioning the Lava Ridge Wind Project. The proposed project includes up to 400 wind energy generating turbines, up to seven new substations, approximately 198 miles of 34.5 kilovolt (kV) collector lines, 34 miles of 230 kV transmission lines, 18 miles of 500 kV transmission lines, 381 miles of access roads, 47 miles of temporary crane walk paths, a battery energy storage system, three operations and maintenance facilities, five permanent met towers, and construction-related staging yards. Engineering is preliminary, but the turbines may have a maximum height (including the rotor) of up to 740 feet.

The proposed project is located primarily on public lands administered by the Bureau of Land Management (BLM) Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within the Idaho counties of Jerome, Lincoln, and Minidoka. MVE has proposed to locate all components of the project within a series of corridors. These corridors are approximately 1/2 mile wide and cover approximately 76,000 acres, of which 73,000 acres are located on public lands managed by the BLM and 3,000 acres are State Lands managed by the Idaho Department of Lands.

The project's planned 500 kV transmission line may interconnect at the existing Idaho Power Midpoint substation approximately 7 miles south of Shoshone, Idaho, or at an alternative location inside the right-of-way corridor for the not yet constructed Southwest Intertie Project – Northern Portion.



What is an Environmental Impact Statement (EIS)?

Under the National Environmental Policy Act (NEPA), an EIS is prepared for major federal actions that may have a significant effect on the environment. The purpose of an EIS is to identify potential issues related to the project, analyze the project impacts, disclose them to the public, and use the information developed to make informed decisions. The EIS is a public document, and the public is encouraged to provide input throughout the development of the EIS. The EIS is not a decision document, but it provides information to the BLM decision makers in order to make informed decisions. See “A Citizen’s Guide to NEPA, Having Your Voice Heard,” at <https://ceq.doe.gov/docs/get-involved/citizens-guide-to-nepa-2021.pdf> for more information on the EIS process or request a copy online from the BLM office using the contact information provided in this handout.



What is the process for preparing an EIS?

There are a number of steps involved in preparing an EIS (see graphic). The EIS process begins with the publication of a notice of intent (NOI) in the Federal Register, which initiates the scoping period. The BLM will use information derived from public scoping comments to identify potential resource concerns, potential project modifications and alternatives, and mitigation measures that could be used to minimize impacts. The process will be documented and the impacts disclosed in a draft EIS. After public review of the draft EIS, comments on the draft EIS will be considered and incorporated into the final EIS. The BLM will issue a record of decision at the close of the EIS process.

What is scoping?

The EIS is in the first stage, called public scoping, in which potential environmental issues, project modifications, and mitigation to be evaluated in the draft EIS are identified. During the scoping period, the public is encouraged to provide comments and information on factors that should be considered in the EIS. Public meetings will be held during the scoping period to provide information and solicit public comments. The times and locations for public meetings will be posted on the project website and through media outlets. The scoping period begins with the publication of the NOI in the Federal Register.

What role does the BLM play in this project?

The BLM is the lead agency for the development of the EIS for the proposed Lava Ridge Wind Project. The BLM must decide whether, how, and under what conditions to authorize Magic Valley Energy’s proposed action while supporting resource goals and objectives. The BLM has determined that this is a major federal action that requires the preparation of an EIS.



Which resources may potentially be affected (among others)?

- Wildlife and Sensitive Species
- Cultural and Historic Properties
- Visual Resources
- Socioeconomics
- Transportation
- Recreation
- Wildfire Management
- Livestock Grazing
- Soil and Vegetation

What is a Cooperating Agency?

The cooperating agency role derives from NEPA, which calls on federal, state, and local governments to cooperate with the goal of achieving “productive harmony” between humans and the environment. The Council on Environmental Quality’s regulations implementing NEPA allow federal agencies (as lead agencies) to invite tribal, state, and local governments, as well as other federal agencies, to serve as “cooperating agencies” in the preparation of EISs.

Who are the Cooperating Agencies for this project?

- National Park Service
- U.S. Army Corps of Engineers
- Idaho Department of Environmental Quality
- Idaho Department of Fish and Game
- Idaho Department of Lands
- Idaho Office of Energy and Mineral Resources
- Idaho Office of Species Conservation
- Idaho State Department of Agriculture
- Idaho State Historical Society
- Jerome County, Idaho
- Lincoln County, Idaho
- Minidoka County, Idaho



For more information on how to become a Cooperator for the Lava Ridge Wind Project:

Mail: Kasey Prestwich, Project Manager
BLM Shoshone Field Office
400 West F Street
Shoshone, ID 83352

Phone: 208-732-7204
Email: kprestwich@blm.gov
Website: <https://go.usa.gov/xFKxg>

¿Cómo puedo participar en la Declaración de impacto ambiental ("EIS", por sus siglas en inglés) y en el proceso de evaluación y mantenerme informado?

- Asista a las reuniones de evaluación para conocer mejor el proyecto y plantear sus preguntas.
- Visite el sitio web del proyecto de la BLM y envíe sus comentarios: <https://go.usa.gov/xFKxg>. Haga clic en el botón "Participate Now" (Participe Ahora), que se encuentra a la derecha del enlace del documento.
- Inscríbase en la lista de correo del proyecto para recibir actualizaciones del mismo o envíe sus comentarios por correo electrónico: BLM_ID_LavaRidge@blm.gov
- Envíe sus comentarios por correo a Kasey Prestwich, Gerente del proyecto, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- Para más información sobre las reuniones públicas o la propuesta de proyecto, póngase en contacto con Kasey Prestwich, teléfono 208-732-7204, correo electrónico kprestwich@blm.gov.

Cómo hacer comentarios relevantes

Su participación es fundamental en el proceso de toma de decisiones. Necesitamos sus comentarios para identificar los problemas que puedan surgir si el proyecto sigue adelante. Para aprovechar al máximo su aportación, a continuación, le indicamos algunos puntos que debe tener en cuenta a la hora de hacer un comentario sobre el proyecto:

- Procure que sus comentarios se centren en el proyecto propuesto y en lo que se está analizando.
- Reflexione sobre las preocupaciones que tenga con respecto a las posibles repercusiones del proyecto y explíquelas con detalle.
- Asegúrese de presentar sus comentarios dentro del plazo anunciado. De este modo, la BLM tendrá todas las preocupaciones documentadas para utilizarlas en la EIS.

Los comentarios deberán enviarse por correo a más tardar el 20 de septiembre de 2021.

Los comentarios más útiles son los que aportan información relevante a la BLM. Los comentarios realizados durante el proceso de evaluación o sobre la EIS no cuentan como votos ni como parte de un referéndum sobre la decisión de la BLM.

- Se utilizan para mejorar el documento y los análisis para determinar adecuadamente los impactos ambientales antes de que la BLM tome las decisiones finales sobre el proyecto propuesto.
- Evite los comentarios que digan "estoy a favor de este proyecto" o "me opongo a este proyecto".
- Los comentarios deben centrarse en la identificación de los recursos potencialmente afectados, los posibles problemas de recursos que deben analizarse y las fuentes de datos que BLM pueda desconocer.
- Recuerde que cuanto más claros, concisos y relevantes para el proyecto sean sus comentarios, más eficaces y útiles serán para mejorar la EIS e influir en la decisión de la BLM.

Lugares de reunión

Debido a la preocupación de la agencia por el reciente aumento de casos de COVID-19, las reuniones públicas de alcance serán virtuales (en línea).

Miércoles, 8° de septiembre de 2021, 2:00 - 3:00 p.m MDT

Enlace para pre-registrarse en el seminario web de Zoom:

https://us02web.zoom.us/webinar/register/WN_0VtuiJ5GR0qD1kjkjX2xWA

Jueves, 9° de septiembre de 2021, 6:00 - 7:00 p.m MDT

Enlace para pre-registrarse en el seminario web de Zoom:

https://us02web.zoom.us/webinar/register/WN_S-xxX4h0StizbVJVGTtR2g

Los seminarios web incluirán una presentación pregrabada y un periodo de preguntas y respuestas.



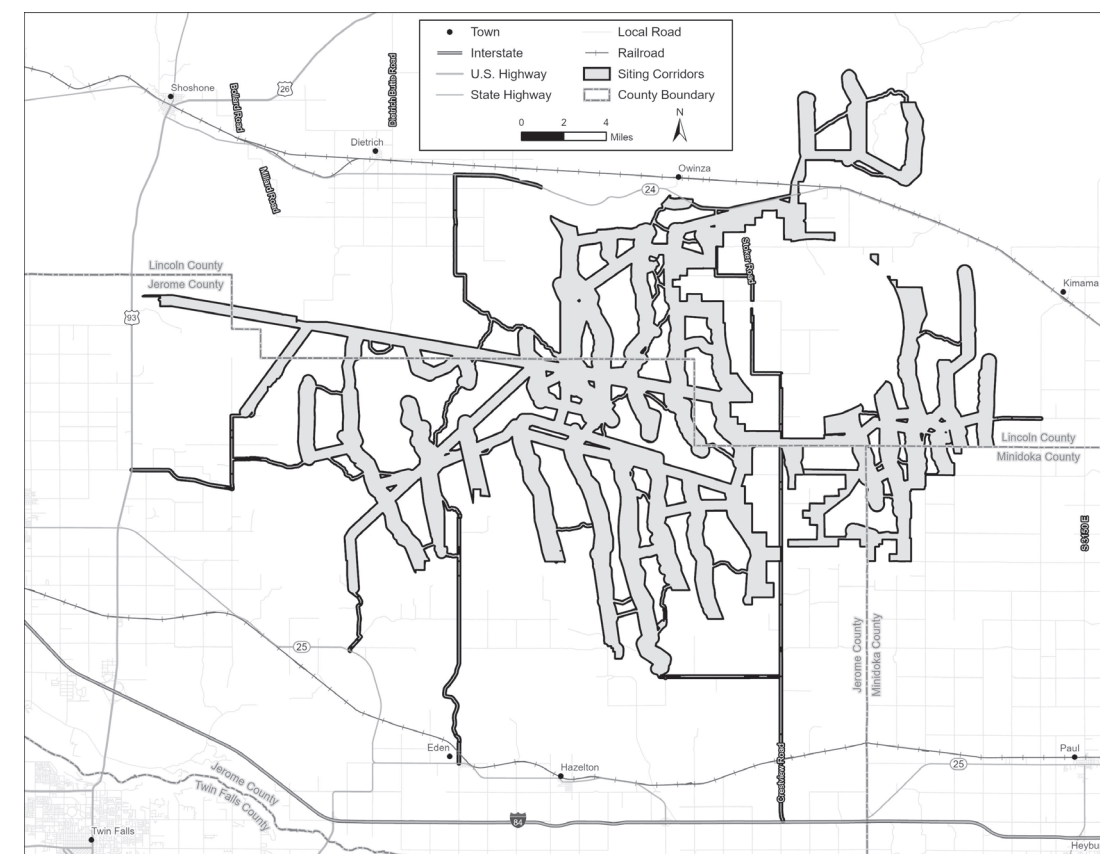
Proyecto eólico Lava Ridge

Información evaluativa

Magic Valley Energy, LLC (MVE) está solicitando autorización para utilizar terrenos federales para la construcción, operación, mantenimiento y desmantelamiento del proyecto eólico Lava Ridge. El proyecto propuesto incluye hasta 400 turbinas de generación de energía eólica, hasta siete subestaciones nuevas, aproximadamente 198 millas de líneas colectoras de 34.5 kilovoltios (kV), 34 millas de líneas de transmisión de 230 kV, 18 millas de líneas de transmisión de 500 kV, 381 millas de caminos de acceso, 47 millas de caminos temporales para grúas, un sistema de almacenamiento de energía en baterías, tres instalaciones de operaciones y mantenimiento, cinco torres de medición permanentes y patios de maniobras relacionados con la construcción. El diseño es preliminar, pero las turbinas pueden tener una altura máxima (incluyendo el rotor) de hasta 740 pies.

El proyecto propuesto se ubica principalmente en terrenos públicos administrados por la Oficina local Shoshone de la Oficina de Administración de Tierras (BLM, por sus siglas en inglés), aproximadamente a 25 millas al noreste de Twin Falls, Idaho, dentro de los condados de Jerome, Lincoln y Minidoka, en el estado de Idaho. MVE ha propuesto ubicar todos los componentes del proyecto dentro de una serie de corredores. Estos corredores tienen un ancho aproximado de 1/2 milla y cubren aproximadamente 76,000 acres, de los cuales 73,000 están ubicados en tierras públicas administradas por la BLM y 3,000 acres son tierras estatales administradas por el Departamento de tierras de Idaho.

La línea de transmisión de 500 kV prevista en el proyecto puede interconectarse en la subestación existente de Idaho Power Midpoint, a unas 7 millas al sur de Shoshone, Idaho, o en un lugar alternativo dentro del corredor sobre la vía del proyecto Southwest Intertie - Northern Portion, aún no construido.



¿Qué es una Declaración de impacto ambiental (EIS, por sus siglas en inglés)?

En virtud de la Ley Nacional de Política Ambiental “NEPA”, una EIS se elabora para las principales acciones federales que puedan tener un efecto significativo sobre el medio ambiente. El propósito de una EIS es identificar los problemas potenciales relacionados con el proyecto, analizar los impactos del proyecto, darlos a conocer al público y utilizar la información elaborada para tomar decisiones informadas. La EIS es un documento público, y se invita a las personas a realizar aportaciones a lo largo de la elaboración de la EIS. La EIS no es un documento decisivo, pero proporciona información a los responsables de la BLM para que tomen decisiones con conocimiento de causa. Para obtener más información sobre la NEPA y el proceso de la EIS, consulte “A Citizen’s Guide to NEPA, Having Your Voice Heard” (Guía para los ciudadanos sobre la NEPA, para que se escuche su voz) en <https://ceq.doe.gov/docs/get-involved/citizens-guide-to-nepa-2021.pdf> o solicite una copia en línea a la oficina de la BLM utilizando la información de contacto que se proporciona en este folleto.



¿Cuál es el proceso de elaboración de una EIS?

La elaboración de una EIS consta de diferentes etapas (véase el gráfico). El proceso de elaboración de la EIS comienza con la publicación de un aviso de intención (NOI, por sus siglas en inglés) en el Registro Federal, con lo que se inicia el periodo de evaluación. La BLM utilizará la información obtenida de los comentarios del público para determinar los posibles problemas de los recursos, las posibles modificaciones y alternativas del proyecto y las medidas de mitigación que podrían utilizarse para minimizar los impactos. El proceso se documentará y los impactos se darán a conocer en un anteproyecto de la EIS. Tras la revisión pública del anteproyecto de la EIS, se estudiarán los comentarios sobre el mismo y se incorporarán a la EIS definitiva. La BLM emitirá un acta de resolución al final del proceso de la EIS.

¿Qué es la evaluación?

La EIS se encuentra en la primera fase, denominada de evaluación pública, en la que se identifican los posibles problemas ambientales, las modificaciones del proyecto y las medidas de mitigación que deben evaluarse en el anteproyecto de la EIS. Durante el periodo de evaluación, se invita al público a aportar comentarios e información sobre los factores que deben tenerse en cuenta en la EIS. Durante el periodo de evaluación se celebrarán reuniones públicas para proporcionar información y recibir comentarios de las personas. Los horarios y lugares de las reuniones públicas se anunciarán en la página web del proyecto y en los medios de comunicación.

¿Qué papel desempeña la BLM en este proyecto?

La BLM es la agencia principal para la elaboración de la EIS del proyecto eólico Lava Ridge propuesto. La BLM debe decidir si autoriza la acción propuesta por Magic Valley Energy, cómo y bajo qué condiciones, al mismo tiempo que apoya las metas y objetivos de la BLM y del proyecto. La BLM determinó que se trata de una acción federal de gran importancia que requiere la elaboración de una EIS.



¿Qué recursos pueden verse potencialmente afectados (entre otros)?

- Vida silvestre y especies vulnerables
- Bienes culturales e históricos
- Recursos visuales
- Socioeconomía
- Transporte
- Recreación
- Gestión de incendios forestales
- Pastoreo de ganado
- Suelos y vegetación



¿Qué es un Agencia colaboradora?

El papel del agencia colaboradora lo establece la NEPA [Ley nacional de política ambiental], que insta a los gobiernos federal, estatal y local a cooperar con el fin de lograr una “armonía productiva” entre los seres humanos y el medio ambiente. La normativa del Consejo de calidad ambiental por la que se aplica la NEPA permite a las agencias federales (como agencias principales) invitar a los gobiernos tribales, estatales y locales, así como a otras agencias federales, a actuar como “agencias colaboradores” en la preparación de las EISs.

¿Cuáles son las Agencias colaboradoras de este proyecto? (y sus nombres en inglés)

- Servicio de parques nacionales (National Park Service)
- Cuerpo de ingenieros del Ejército de los Estados Unidos (U.S. Army Corps of Engineers)
- Departamento de calidad ambiental de Idaho (Idaho DEQ)
- Departamento de pesca y caza de Idaho (Idaho Department of Fish and Game)
- Departamento de tierras de Idaho (Idaho Department of Lands)
- Oficina de energía y recursos minerales de Idaho (Idaho Office of Energy and Mineral Resources)
- Oficina de conservación de especies de Idaho (Idaho Office of Species Conservation)
- Departamento de agricultura del estado de Idaho (Idaho Department of Agriculture)
- Sociedad histórica del estado de Idaho (Idaho State Historic Preservation Office)
- Condado de Jerome, Idaho
- Condado de Lincoln, Idaho
- Condado de Minidoka, Idaho



Para más información sobre las Agencias colaboradoras de este proyecto:

Correo: Kasey Prestwich, Gerente del proyecto
BLM Shoshone Field Office
400 West F Street
Shoshone, ID 83352

Teléfono: 208-732-7204

Correo electrónico: kprestwich@blm.gov

Visite el sitio web del proyecto de la BLM:
<https://go.usa.gov/xFKxg>

Virtual Public Scoping Meetings for the Lava Ridge Wind Project Environmental Impact Statement

Purpose

The BLM plans to hold public scoping meetings to provide information on the proposed Lava Ridge Wind Project and the environmental impact statement (EIS) development process. These meetings will focus on addressing questions that participants may have. Please see the end of this guide for information on how to submit a formal comment on the proposed project.

Public Scoping Meeting Schedule

Wednesday, September 8, 2021, 2:00-3:00 PM MDT

Thursday, September 9, 2021, 6:00-7:00 PM MDT

The public scoping meetings will be hosted using the Zoom webinar application. The Zoom app is free to download and use. The app can be accessed on your computer, smartphone, or tablet. You can also access the Zoom meeting using your web browser. There will be a call-in number for those who want to listen to the meeting by phone.

Register for a Public Scoping Meeting

1. Click on the registration* link for the meeting you would like to attend:

Wednesday, September 8, 2021, 2:00-3:00 PM MDT

Pre-register here: https://us02web.zoom.us/webinar/register/WN_0VtuiJ5GR0qD1kjkjX2xWA

Thursday, September 9, 2021, 6:00-7:00 PM MDT

Pre-register here: https://us02web.zoom.us/webinar/register/WN_S-xxX4h0StizbVJVGTtR2g

2. Once registered, you will receive a **confirmation** email with information on how to access the meeting.

Download a Copy of the Meeting Materials

Prior to the meeting, you can download a copy of the pre-recorded presentation and the scoping posters by going to the BLM's project website: <https://go.usa.gov/xFKxg>. This is recommended if you have concerns about internet bandwidth.

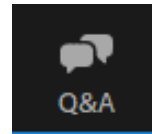
Joining the Meeting

On your chosen meeting date and time, it is recommended that you access the meeting at least 5-10 minutes prior to the meeting start time to ensure you have time to access the meeting, familiarize yourself with Zoom, and not miss important introductory information.

All attendees will be muted during the meeting. You will be able to submit questions via the Zoom Question & Answer chat.

Question & Answer

At any point during the meeting, attendees may use the Q&A chat to submit a written question to the hosts and panelists.



How to Submit Comments

In order to give enough time for questions and answers during the public scoping meetings, please do not submit comments during the meetings. If you would like to submit a comment, please do so in writing using one of the following methods:

- Online at <https://go.usa.gov/xFKXg>. Click on the “Participate Now” button to the right of the document link. Enter your comment and information, then click “Submit”.
- By email: BLM_ID_LavaRidge@blm.gov
- By mail to: Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352

Comments should be postmarked by the end of the scoping period, September 20, 2021.

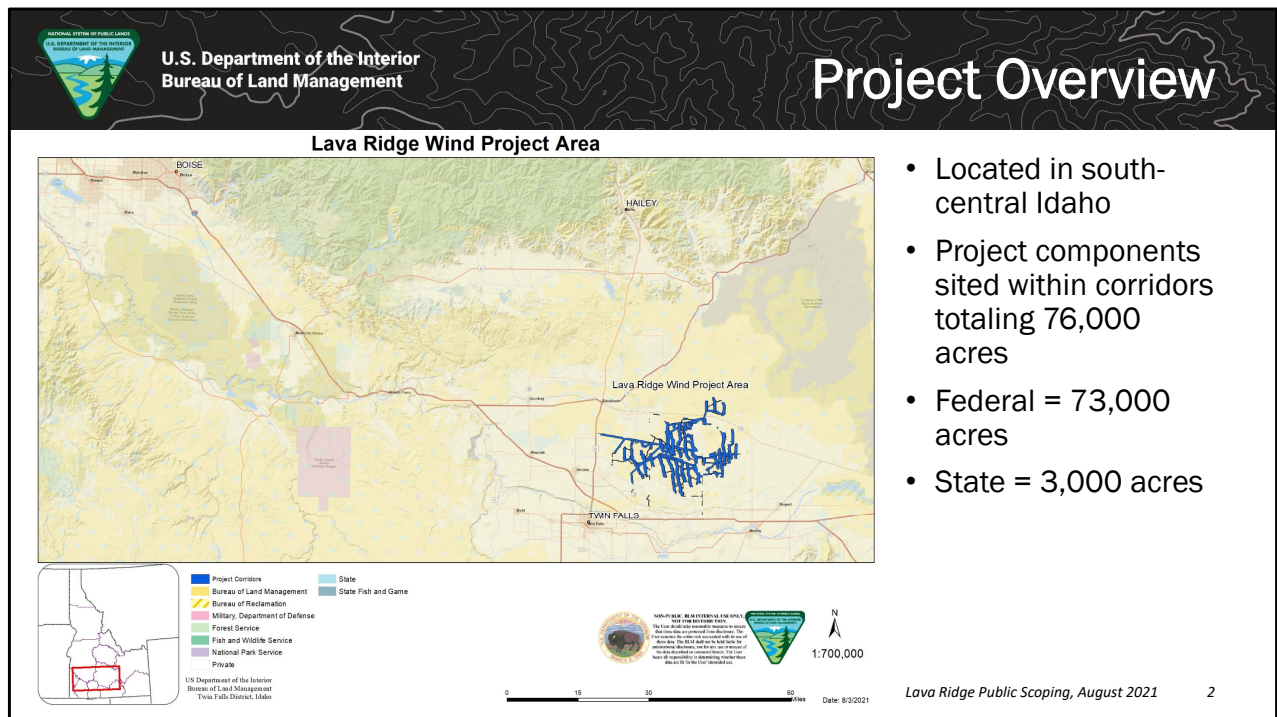
*Completion of the registration form is completely voluntary and any identifying information provided will become part of the public record, and as such, must be released to any individual upon request. Requests to withhold comments and associated personal identifying information from public review cannot be guaranteed.



Thank you for your interest in the Environmental Impact Statement for the Proposed Lava Ridge Wind Project.

The purpose of this presentation is to:

- Briefly describe some of the key elements of the proposed project,
- Describe the BLM's role in evaluating the project,
- Describe the Environmental Impact Statement, or EIS, process and Provide information on how you may submit input on issues and concerns to be considered in the EIS.



Magic Valley Energy, LLC or MVE, is a subsidiary of LS Power and is the project applicant. MVE is seeking authorization to use public lands to construct, operate, maintain, and decommission the Lava Ridge Wind Project within lands managed by the BLM's Shoshone Field Office.

The Lava Ridge Wind Project is a proposed commercial-scale wind energy project. It would be located in south-central Idaho, approximately 25 miles northeast of Twin Falls. The project area consists of a series of corridors located within Lincoln, Jerome, and Minidoka Counties. These corridors are approximately 1/2 mile wide and span about 76,000 acres. This includes 73,000 acres of public lands managed by the BLM and 3,000 acres of State Lands managed by the Idaho Department of Lands.



U.S. Department of the Interior
Bureau of Land Management

Project Summary

Project Elements

- Up to 400 wind turbines
- Up to seven new substations
- Buried and overhead 34.5 kilovolt (kV) collector lines, overhead 230 kV and 500 kV transmission lines
- ~ 381 miles of access roads
- A battery energy storage system
- Up to three operations and maintenance facilities
- Construction-related (temporary) staging yards

System Interconnection

- Possible interconnection points at the Idaho Power Midpoint substation or an alternative location inside the right-of-way corridor for the not yet constructed Southwest Intertie Project – Northern Portion

Timeframe

- Two-year construction timeframe
- MVE's goal is for operations to begin within 2024

Lava Ridge Public Scoping, August 2021

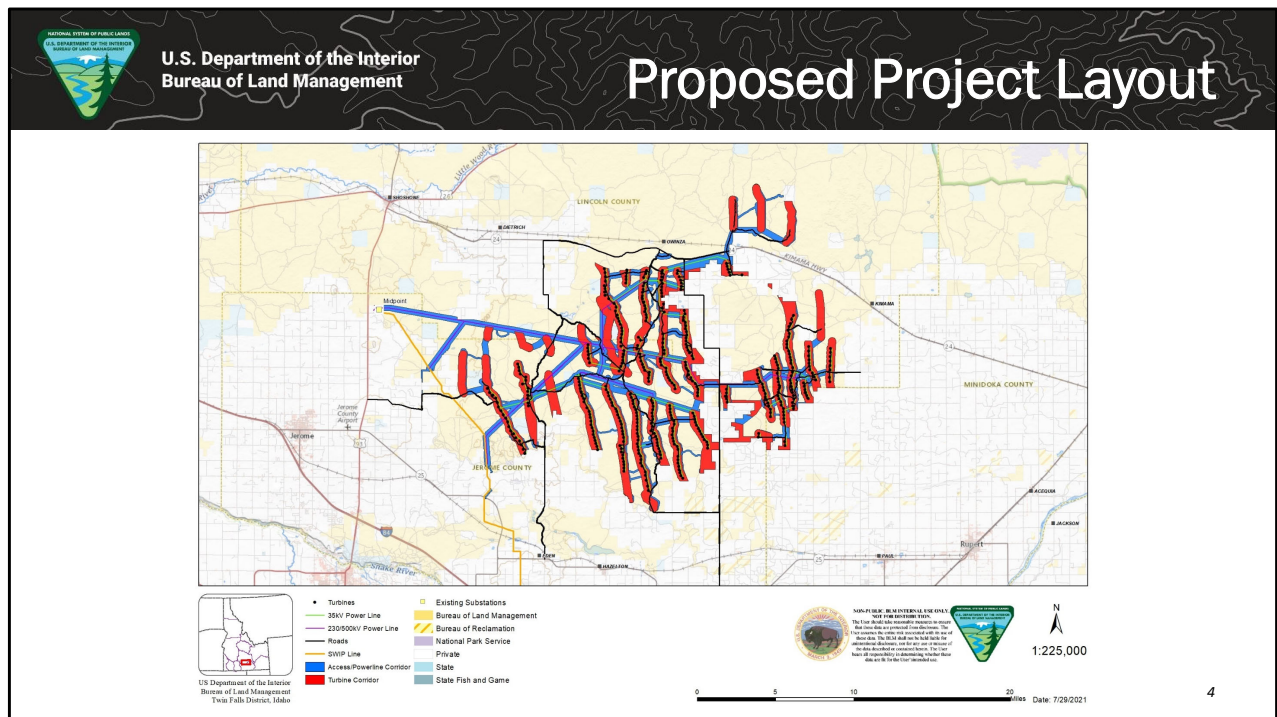
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As proposed, the Lava Ridge Wind Project would be the largest wind farm in the State of Idaho. The project would include up to 400 wind energy generating turbines, up to seven new substations, over 200 miles of project-related powerlines, about 381 miles of access roads, 47 miles of temporary crane paths, a battery energy storage system, up to three operations and maintenance facilities, five permanent met towers, and construction-related staging yards. MVE has identified a range of potential turbine sizes that would have a generating capacity of 2 to 6 megawatts per turbine and would have heights ranging from 460 to 740 feet tall. The project is anticipated to have a generation capacity of 1,000 megawatts or more.

The proposed infrastructure would encumber approximately 10,000-acres once fully constructed; however, only about 5,400 acres of the encumbrance footprint would be disturbed during construction activities and approximately two-thirds of the disturbed area would be reclaimed after construction activities are completed. Disturbed areas not reclaimed after construction activities will continue to be utilized for operation and maintenance activities.

The project's 500 kilovolt transmission line may interconnect at the existing Idaho Power Midpoint substation approximately 7 miles south of Shoshone, or at an alternate location inside the right-of-way corridor for the not yet constructed, Southwest Intertie Project – Northern Segment, or SWIP-North. The Project's connection with Midpoint Substation or SWIP-North will facilitate transmission of electricity generated by the project to energy markets across the western United States.

MVE has proposed a two-year construction timeframe to help meet their goal for producing electricity by the end of 2024.



This map depicts key elements of the proposed project and its layout, including turbines, roads, and transmission lines. Corridors in which turbines would be located are depicted in red. The blue corridors would be limited to powerlines, access roads, and other supporting infrastructure. The red corridors that do not show turbines sited within them are potential alternate locations for turbines that cannot be constructed within the locations as shown. These alternate locations will be included in the BLM's evaluation of MVE's proposal.



U.S. Department of the Interior
Bureau of Land Management

Purpose and Need

Purpose

The purpose of the proposed Lava Ridge Wind Project is to provide clean wind energy to meet increasing demands for electricity within the western United States.



Need

Respond to the proponent's request for authorization to use federal lands for constructing, operating, maintaining, and decommissioning the Lava Ridge Wind Project.



Lava Ridge Public Scoping, August 2021

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The purpose of the project is to provide clean wind energy to meet increasing demands for electricity within the western United States and to decrease the carbon footprint and impacts on climate change. In Executive Order 14008, President Biden emphasized the need for the United States to “deploy the full capacity of its agencies to combat the climate crisis” in an approach that focuses attention on “innovation, commercialization, and deployment of clean energy technologies and infrastructure.” The Department of the Interior has since prioritized “identifying steps to accelerate responsible development of renewable energy on public lands and waters.”

The BLM will evaluate the right of way application submitted by MVE in compliance with the Federal Land Policy and Management Act, the BLM’s right of way regulations, and other applicable Federal laws and policies. The purpose of and need for the project will be used to formulate a reasonable range of alternatives to be considered and analyzed during the National Environmental Policy Act analysis process. The BLM will evaluate these alternatives through an EIS.



U.S. Department of the Interior
Bureau of Land Management

NEPA and the EIS Process

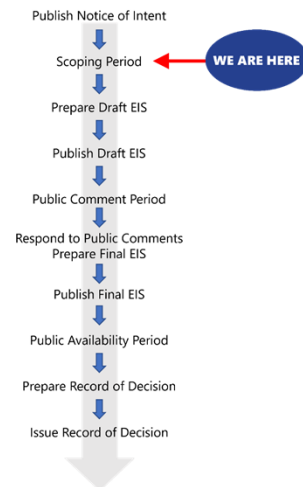
What is an EIS?

An EIS is prepared to analyze and disclose effects of a proposed action on the environment, and to consider reasonable alternatives and mitigation measures.

What is Scoping?

Scoping is an opportunity for the public to help agencies identify relevant issues and potential alternatives. Scoping occurs early in the NEPA process.

National Environmental Policy Act Environmental Impact Statement Process



Lava Ridge Public Scoping, August 2021

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The National Environmental Policy Act of 1969, also known as NEPA, establishes the process for carrying out an evaluation of a project.

An EIS is prepared to analyze and disclose effects of a proposed action on the natural and human environment, and to consider reasonable alternatives and mitigation measures. The EIS will inform the BLM's decision on whether to approve, approve with modifications, or deny MVE's application to build the Lava Ridge Wind Project. This decision will be documented at the end of the analysis process in a Record of Decision.

The EIS analysis process includes steps to ensure coordination and collaboration between agencies and to provide the interested public with opportunities to provide input, identify issues, and offer solutions early in the NEPA process. The scoping period, which we are in now, is the first formal opportunity to gather that input. Information and perspectives shared during scoping will inform the analysis, alternatives development, and mitigation measures considered in the EIS.



U.S. Department of the Interior
Bureau of Land Management

Preliminary Issues for Analysis



Lava Ridge Public Scoping, August 2021

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The BLM must analyze the full range of effects of the proposed project and reasonable alternatives. The EIS analysis will describe effects, as well as ways to “mitigate” those effects. An effect or “impact” is a change or consequence that results from an activity, such as the Lava Ridge Wind Project. Impacts can be positive, negative, or both.

The BLM has identified the following as preliminary issues for analysis and would appreciate public and agency input on these and other potential effects:

- **Socioeconomics** – Evaluating the economic and social impacts of the project on local communities or populations.
- **Land Use** – Determining the compatibility of the project with designated land uses on surrounding lands.
- **Transportation** – Assessing effects of project-related traffic on existing traffic patterns on major public roads.
- **Recreation** – Determining project effects on recreation uses.
- **Soils and Vegetation** – Evaluating long-term impacts to soils and the protection, maintenance, and restoration of vegetation resources.
- **Livestock Grazing** – Assessing project effects on livestock forage, active preference grazing permits, and livestock physiology.
- **Avian and Bat Species** – Determining project effects on populations and habitat of avian and bat species, including eagles and greater sage-grouse.
- **Other Species** – Evaluating project effects on big game habitat and populations, pollinators, and special-status species.
- **Wildfire Management** – Evaluating change in the potential for wildfire ignition and wildfire suppression capabilities, and the ability to meet fuels reduction and ecosystem restoration goals.
- **Treaty Rights** – Evaluating project effects on the Treaty and non-Treaty rights of Native American Tribes.
- **Cultural Resources and Historic Properties** – Assessing physical effects of project-related activity on cultural and tribal resources and visual and other nonphysical effects on historic properties in the viewshed.
- **Visual Resources** – Determining project impacts on the visual character and scenic quality experienced at key observation points in the landscape, including dark skies and shadow flicker.



U.S. Department of the Interior
Bureau of Land Management

NHPA Section 106

Section 106 of the National Historic Preservation Act (NHPA)

requires Federal agencies to consider the effects of their undertakings on historic properties that are included or may be eligible for inclusion on the National Register of Historic Places. The BLM has begun the development of a Programmatic Agreement to guide the identification and treatment of such properties that may be adversely affected by the Lava Ridge Wind Project. The Section 106 process will run concurrently with the NEPA EIS analysis, with the aim to finalize a Programmatic Agreement at the same time as the Record of Decision under NEPA.



Lava Ridge Public Scoping, August 2021

The BLM is seeking your input to help identify historic properties that may be affected by the Lava Ridge Wind Project.

If you are interested in sharing information on these resources or have questions about the Section 106 process, please contact:

Kelli Barnes, BLM Idaho State Office

Phone: 208-373-3844

Email: kbarnes@blm.gov

You may also provide written comments regarding cultural resources and historic properties as part of the NEPA scoping comment process.

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or By

Email: kbarnes@blm.gov

You may also provide written comments regarding cultural resources and historic properties as part of the NEPA scoping comment process. Further instruction on submitting comments is provided at the end of this presentation.



U.S. Department of the Interior
Bureau of Land Management

Cooperating Agencies

What is a Cooperating Agency?

The BLM is committed to engaging and involving our agency partners as cooperating agencies. Any federal, state, or local agency with jurisdiction by law or special expertise with respect to an environmental issue may, by agreement, be a cooperating agency.

A Cooperating Agency Will:

- Contribute staff to participate on the EIS interdisciplinary team.
- Participate in the EIS process and be formally involved in scoping.
- Provide leadership, expertise, guidance, and review for the EIS analysis.
- Provide information related to the agency's role.
- Identify issues of concern regarding project impacts on the natural and human-made environment.
- Provide timely input on unresolved issues.

Lava Ridge Public Scoping, August 2021

To Become a Cooperating Agency:

Respond in writing, describing your jurisdiction and special expertise, as well as the potential physical, natural, and socioeconomic issues or concerns that are of interest to your agency.

- An agreement (MOU) will be signed prior to your participation.
- Your participation may include those activities outlined in 40 CFR 1501.6(b).

For more information on how to become a cooperating agency for the Lava Ridge Wind Project:

Mail: Kasey Prestwich, Project Manager
BLM Shoshone Field Office, 400 West F Street,
Shoshone, ID 83352

Phone: 208-732-7204

Email: kprestwich@blm.gov

Website: <https://go.usa.gov/xFKXg>

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Over the past year the BLM has entered into agreements with multiple federal, state, and local agencies to establish cooperating agency partnerships. The BLM is committed to engaging and involving our agency partners as cooperating agencies. Any additional federal, state, or local agency with jurisdiction by law or special expertise with respect to an environmental issue may, by agreement, be a cooperating agency.

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For more information on how to become a cooperating agency for the Lava Ridge Wind Project, please contact Kasey Prestwich at the BLM Shoshone Field Office using the contact information on the screen.



U.S. Department of the Interior
Bureau of Land Management

Providing Comments

Online: <https://go.usa.gov/xFKxg>, and click on “Participate Now”

Email: BLM_ID_LavaRidge@blm.gov

Mail to: Kasey Prestwich, Project Manager, BLM Shoshone Field Office,
400 West F Street, Shoshone ID 83352

We hope you will consider participating in this scoping effort for the Lava Ridge Wind Project. All interested parties and agencies are invited to submit written comments before the end of the scoping period.

You can do so in three ways:

Online at the BLM’s project website at <https://go.usa.gov/xFKxg>

By sending an email to BLM_ID_LavaRidge@blm.gov

Or by mailing your comment to: Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352



U.S. Department of the Interior
Bureau of Land Management

For More Information

Kasey Prestwich

Lava Ridge Wind Project EIS Project Manager

Phone: 208-732-7204

E-mail: kprestwich@blm.gov

Project website: <https://go.usa.gov/xFKxg>

Thank you for your attention. Further information about the project and public scoping meetings can be found on the BLM's project website at <https://go.usa.gov/xFKxg>. If you have specific questions and would like to speak with someone about the project, please contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager by Phone: 208-732-7204 or by E-mail: kprestwich@blm.gov

Lava Ridge Wind Project

Purpose

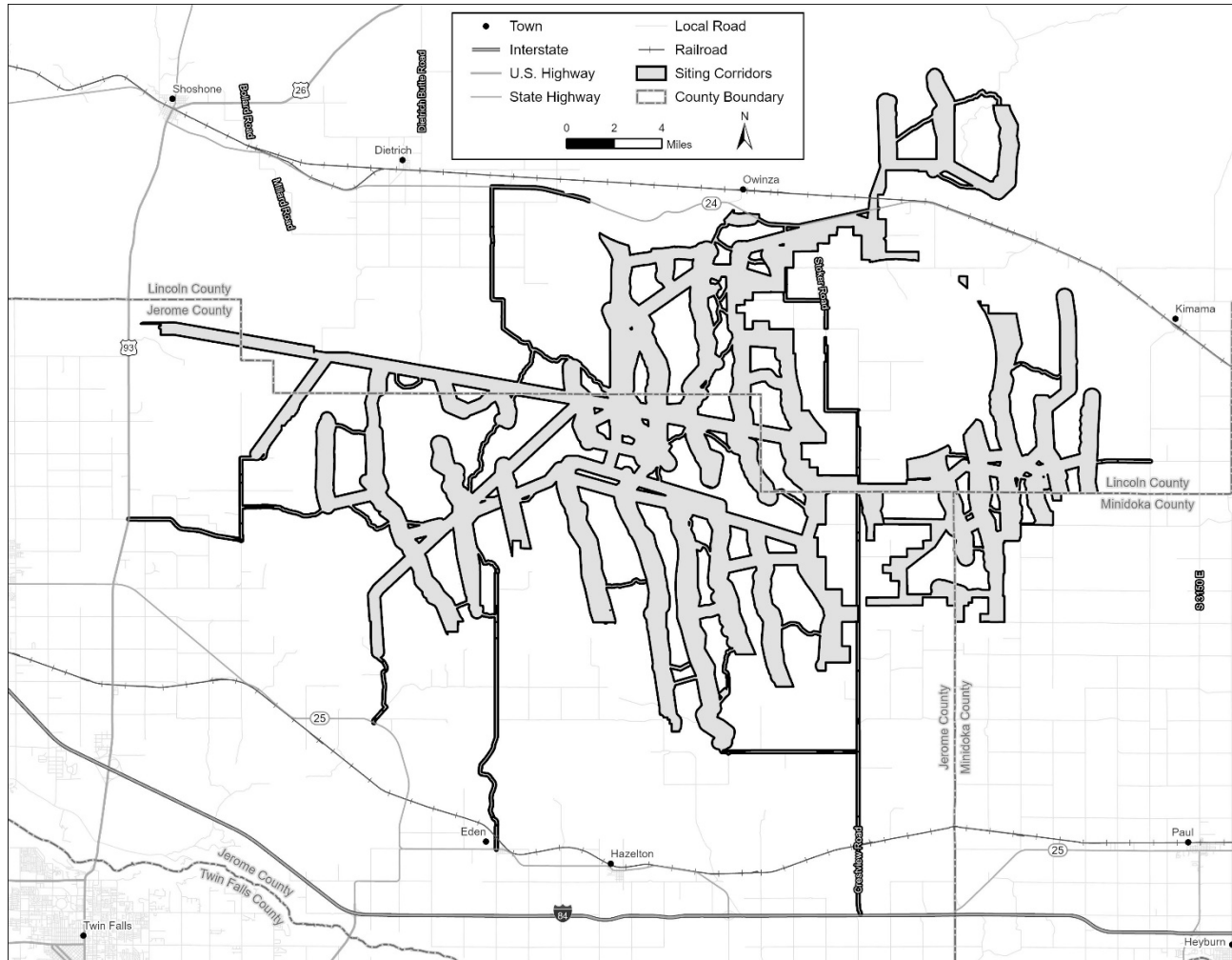
The purpose of the proposed Lava Ridge Wind Project is to provide clean wind energy to meet increasing demands for electricity within the western United States.

Need

Respond to the proponent's request for authorization to use federal lands for constructing, operating, maintaining, and decommissioning the Lava Ridge Wind Project.



Lava Ridge Wind Project



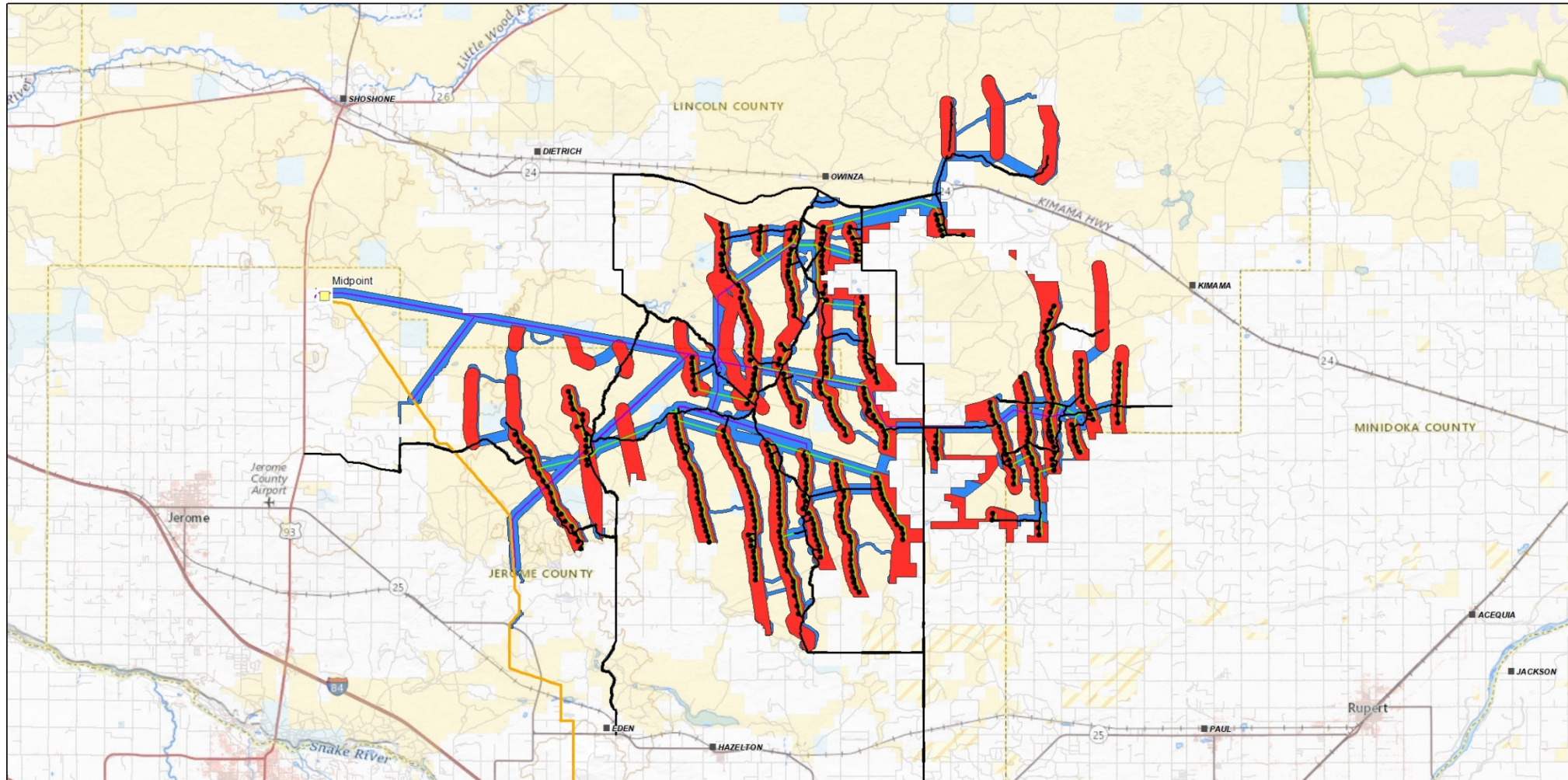
Lava Ridge Wind Project Description

Magic Valley Energy, LLC (MVE) is seeking authorization to use federal lands for constructing, operating, maintaining, and decommissioning the Lava Ridge Wind Project. The proposed project includes up to 400 wind energy generating turbines, up to seven new substations, approximately 198 miles of 34.5 kilovolt (kV) collector lines, 34 miles of 230 kV transmission lines, 18 miles of 500 kV transmission lines, 381 miles of access roads, 47 miles of temporary crane walk paths, a battery energy storage system, three operations and maintenance facilities, five permanent met towers, and construction-related staging yards. Engineering is preliminary, but the turbines may have a maximum height (including the rotor) of up to 740 feet.

The proposed project is located primarily on public lands administered by the Bureau of Land Management (BLM) Shoshone Field Office, approximately 25 miles northeast of Twin Falls, Idaho, within the Idaho counties of Jerome, Lincoln, and Minidoka. MVE has proposed to locate all components of the project within a series of corridors. These corridors are approximately 1/2 mile wide and cover approximately 76,000 acres, of which 73,000 acres are located on public lands managed by the BLM and 3,000 acres are State Lands managed by the Idaho Department of Lands.

The project's planned 500 kV transmission line may interconnect at the existing Idaho Power Midpoint substation approximately 7 miles south of Shoshone, Idaho, or at an alternative location inside the right-of-way corridor for the not yet constructed Southwest Intertie Project – Northern Portion.

Lava Ridge Wind Project



US Department of the Interior
Bureau of Land Management
Twin Falls District, Idaho

- | | |
|---------------------------|---------------------------|
| • Turbines | Existing Substations |
| 35kV Power Line | Bureau of Land Management |
| 230/500kV Power Line | Bureau of Reclamation |
| Roads | National Park Service |
| SWIP Line | Private |
| Access/Powerline Corridor | State |
| Turbine Corridor | State Fish and Game |

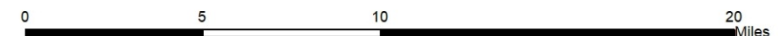
Lava Ridge Wind Project September 2021



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Date: 7/29/2021



Lava Ridge Wind Project

NEPA and the EIS Process

The National Environmental Policy Act of 1969 (NEPA) requires the lead federal agency (BLM) to evaluate effects of the proposed project on the natural and human environment. The EIS will include a detailed analysis of potential environmental impacts from which decision-makers can make an informed decision.

Key Milestones during the EIS process include:

Scoping

- » Public meetings
- » 30-day comment period
- » Identify issues for consideration

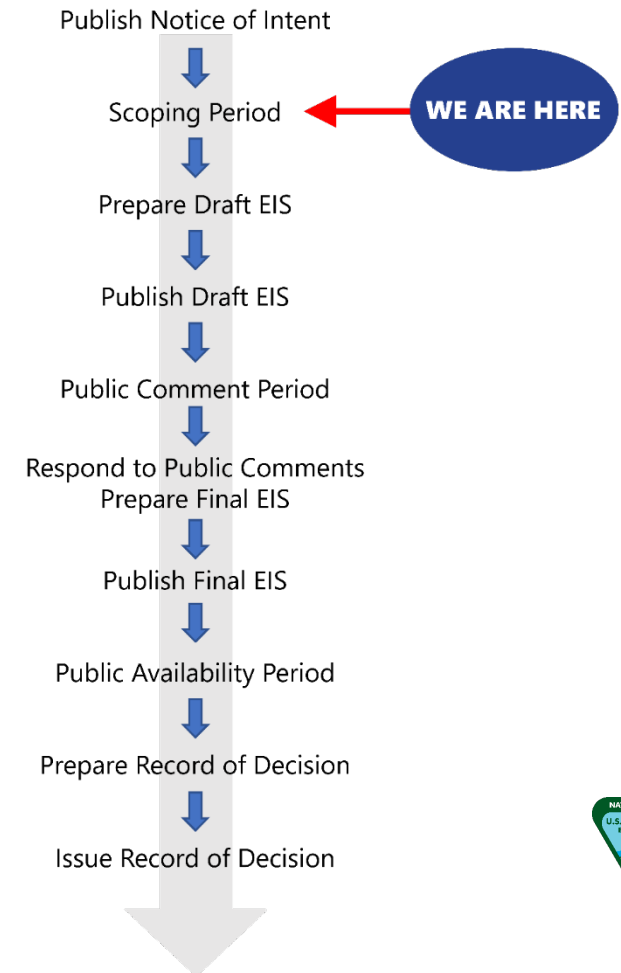
Draft EIS

- » Public information meetings
- » 45-day public review
- » Disclose technical studies and potential impacts of proposed action and a range of alternatives
- » Identify agency preferred alternative

Final EIS

- » Address public comments and concerns received
- » 30-day public availability period

National Environmental Policy Act Environmental Impact Statement Process

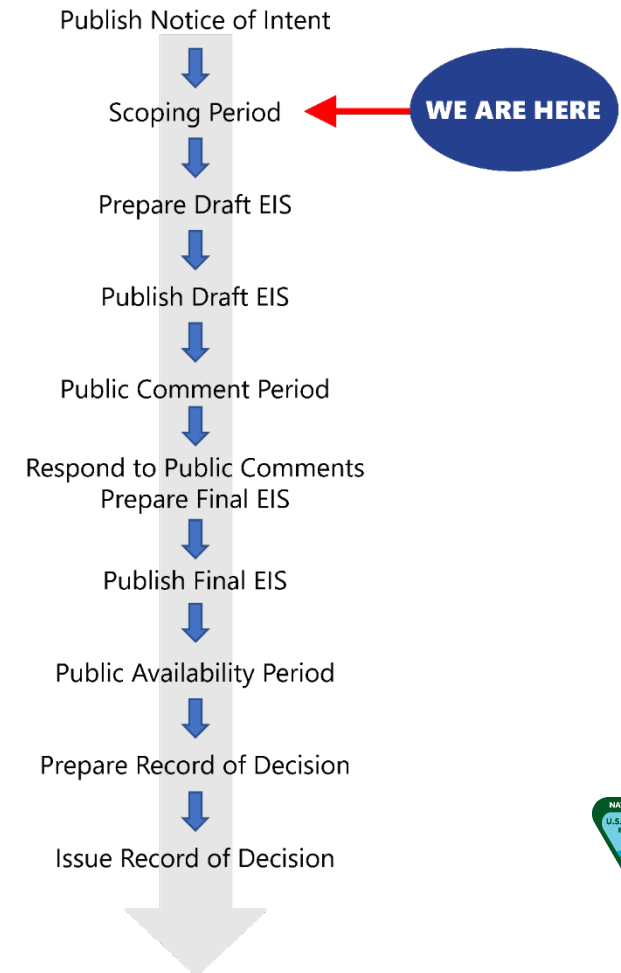


Lava Ridge Wind Project

NEPA EIS Schedule

August 20, 2021	BLM Initiates Public Scoping
September 20, 2021	Scoping Period Ends
Summer 2022	Draft EIS Released for Public Review
Fall 2022	Final EIS Released
Early 2023	Record of Decision (ROD)

National Environmental Policy Act Environmental Impact Statement Process

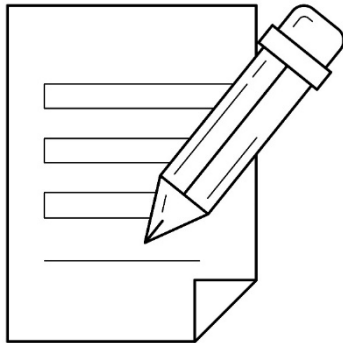


Lava Ridge Wind Project

Tips for Providing an Effective Comment

Effective comments address one or more of the following:

- Resources likely to be affected by the project;
- Potential resource issues that should be analyzed;
- Data sources that the agency may not be aware of; and/or
- Reasonable alternatives to be considered in the analysis.



Ways to Provide a Comment

Online: <https://go.usa.gov/xFKxg>. Click on the “Participate Now” button to the right of the document link. Enter your comment and information, then click “Submit”.

Email: BLM_ID_LavaRidge@blm.gov

Mail: Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352

For more information or if you have further questions contact:

Kasey Prestwich

Phone: 208-732-7204

Email: kprestwich@blm.gov

For Project Updates: <https://go.usa.gov/xFKxg>

**Comments should be postmarked
by September 20, 2021**

Lava Ridge Wind Project

What is a Cooperating Agency?

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To Become a Cooperating Agency:

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- › An agreement (MOU) will be signed prior to your participation.
- › Your participation may include those activities outlined in 40 CFR 1501.6(b).

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Lava Ridge Wind Project

What will be Analyzed?

The agency must analyze the full range of effects of the proposed project and reasonable alternatives to the proposed project.



What is an Effect?

An impact or “effect” is a change or consequence that results from an activity. Effects can be positive, negative, or both.

An EIS describes effects, as well as ways to “mitigate” effects. To “mitigate” means to lessen or remove negative effects.

Issues to be analyzed in the EIS may include but are not limited to:

Socioeconomics – Evaluation of economic and social impacts of the project on local communities or populations.

Land Use – Compatibility of the project with designated land uses on surrounding lands.

Transportation – Effects of project-related traffic on existing traffic patterns on major public roads.

Recreation – Recreation uses and the scenic or visual quality and character of the landscape.

Soils and Vegetation – Evaluation of long-term impacts to soils and the protection, maintenance, and restoration of vegetation resources.

Lava Ridge Wind Project

Visual Resources

Issues to be examined in the EIS include:

- How would the project impact the visual character and scenic quality experienced at key observation points (KOPs)?
- How would project lighting impact sensitive viewers and night skies, including at Craters of the Moon National Monument and Preserve?
- How would wind turbines and associated shadow flicker impact either KOPs or sensitive receptors?

The BLM's visual contrast rating (VCR) process assists with the planning and design of proposed actions to avoid and minimize visual contrast. It is used to conduct visual impact assessments and determine if proposed surface-disturbing activities will meet the visual resource management (VRM) class objectives and allowable level of change established for the area, or if design adjustments or additional visual impact mitigation will be required.

The VCR process involves a systematic comparison of the landscape's visual characteristics before and after the project is implemented, as seen from KOPs, using the basic design elements of form, line, color, and texture. KOPs are "the most critical viewpoints," where there is public sensitivity to visual change due to the type of user, level of use, orientation to the proposed project, etc., such as points or a series of points on a travel route, or at a use area or a potential use area.



Lava Ridge Wind Project

The Intersection of NEPA and Section 106 of the National Historic Preservation Act

Section 106 requires federal agencies to consider the effects of their undertakings on historic properties that are included or may be eligible for inclusion on the National Register of Historic Places and to provide the Advisory Council on Historic Preservation with a reasonable opportunity to comment. In addition, federal agencies are required to consult on the Section 106 process with State Historic Preservation Offices, Tribal Historic Preservation Offices, and Native American Tribes.

The NEPA EIS analysis will consider cultural resources within a study area that encompasses the project footprint and viewshed. Issues identified thus far include physical and non-physical impacts (such as visual) and impacts to Treaty and non-Treaty rights of Native American Tribes.

Under Section 106, the BLM is seeking your input to help identify historic properties and other cultural resources of interest that may be affected by the Lava Ridge Wind Project.

If you are interested in sharing information on these resources or have questions about the Section 106 process, please contact:

Kelli Barnes, BLM Idaho State Office, phone: 208-373-3844, email: kbarnes@blm.gov

You may also provide written comments regarding cultural resources and historic properties as part of the NEPA scoping comment process.

Cultural Resources

Issues to be examined in the EIS include:

- How would the project's ground disturbance physically impact cultural resources (such as Wilson Butte Cave)?
- How would the presence of above-ground infrastructure visually or otherwise non-physically impact cultural resources (such as the Minidoka National Historic Site's Visitor Center)?
- How would the project impact Treaty and non-Treaty rights of Native American Tribes?

Lava Ridge Wind Project

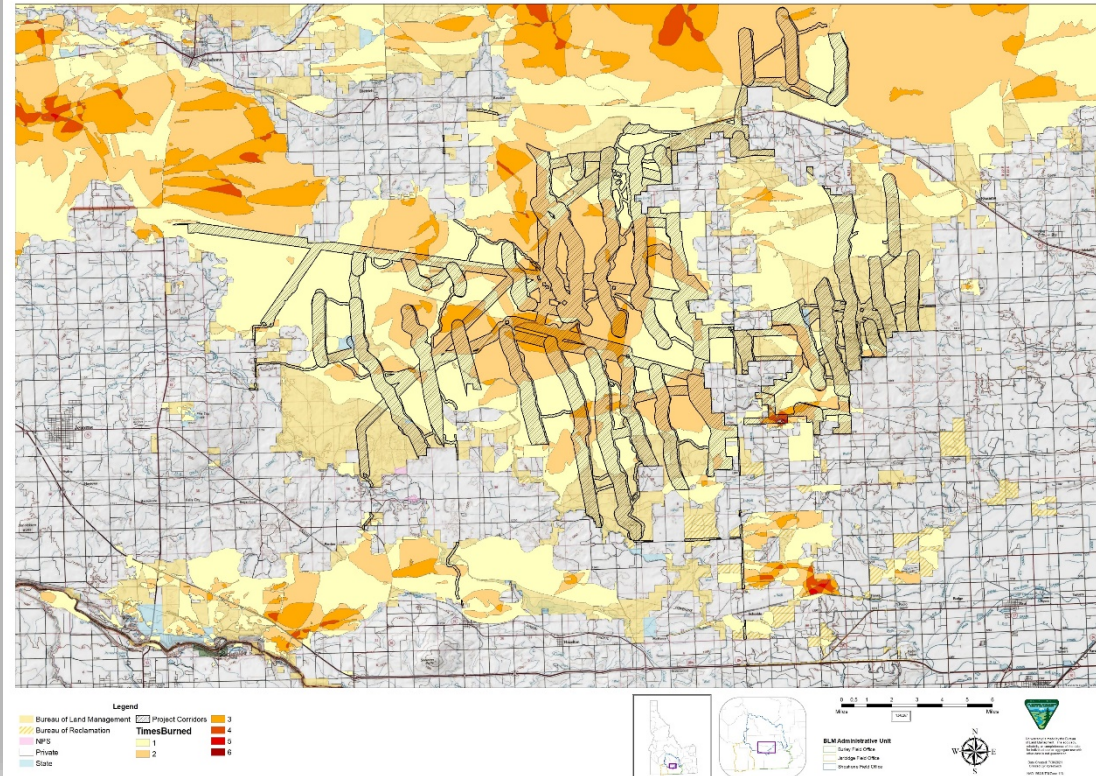
Wildfire Management

- How would the project change the potential for wildfire ignitions and wildfire suppression capabilities?
- How would the project affect the ability to meet fuels reduction and ecosystem restoration goals?



Lava Ridge Wind Project September 2021

Lava Ridge Wind Project - Times Burned Since 1980



Since 1980, 1,378 wildfire ignitions have occurred within a 20-mile radius of the project area. Over 76% of the fires within this area were human-caused ignitions and over 84% of the fires were contained at less than 1,000 acres.

Lava Ridge Wind Project

Avian and Bat Species

- How would turbine operation affect bat and avian populations (including eagles)?
- How would project construction, operation, and decommissioning affect bat roosting habitat?
- How would wildlife resources, threatened and endangered species, and habitat be protected?
- How would the project affect greater sage-grouse?



Other Species

- How would the project affect big game habitat and species distribution in the analysis area?
- How would the project affect pollinators?
- How would the project affect BLM special-status species?



Section 7 of the Endangered Species Act directs federal agencies to ensure authorized actions that are not likely to jeopardize the continued existence of threatened, or endangered species or result in destruction of critical habitat. A biological assessment will be prepared to examine impacts to federally listed wildlife and plant species.

The **Migratory Bird Treaty Act** implements the United States' commitment to international conventions for the protection of migratory birds. Under the Act, taking, killing, or possessing migratory birds is unlawful. More than 800 species of migratory birds are protected under this law, including raptor species (such as the ferruginous hawk). The **Bald and Golden Eagle Protection Act** prohibits anyone, without a permit, from "taking" bald eagles or golden eagles, including their parts, nests, or eggs. Both Acts require federal agencies to ensure authorized actions are not likely to jeopardize the covered species.

Lava Ridge Wind Project

Livestock Grazing

Issues to be examined in the EIS include:

- How would the project affect available livestock forage and subsequent grazing permit active preference?
- How would turbine operation, vehicle traffic, and increased human presence from the project physiologically affect livestock?



A BLM grazing permit is required for commercial livestock use on BLM-managed surface (temporary recreational use by riding and packing livestock is excluded or covered under a special use permit). The project siting corridors intersect seven BLM public land grazing allotments. The EIS analysis will consider temporary and long-term vegetation disturbance in grazing allotments, and the best available science in published literature.

Zoom Webinar Report: September 8, 2021 BLM Public Scoping Meeting, Lava Ridge Wind Project

Question	Asker Name	Answer(s)	
What is the aggregate need for this project? in tons or CY	Adrienne Woods	live answered	
What will it do to local prices?	Adrienne Woods	live answered	
What were other locations that were considered? What sites were considered but not accepted? Why were those sites not selected?	Bif Brigman	live answered	
Is everyone muted automatically?	Joanna Tjaden	Yes. All are muted when joining.	
Would you make the participant list visible? That's an important aspect of public meetings.	Anonymous Attendee	The participant list will be part of the project record and included in the scoping report.	
Is this an open process? How has it been an open process? How have stakeholders from the Japanese American and Native communities engaged? When? Whom have been engaged? It is shocking so few people have heard of this project...	Bif Brigman	live answered	
How many are attending?	Anonymous Attendee	There are currently 87 people in attendance.	
Exactly who would be supplied with the energy generated by this project?	Nicole Shultz	live answered	
Have the environmental impact studies already been done?	Nicole Shultz	live answered	
Will the recordings be made available for the public?	Anonymous Attendee	The presentation and related project documents will be available on the BLM ePlanning website included at the end of this presentation.	
How do organizations and community stakeholders become Consulting Parties? What is the official role of Consulting Parties?	Bif Brigman	live answered	
We have grave concerns for aerial wildlife of all kinds, as well as other wildlife whose habitat will be damaged or restricted by such a project. What are you doing to minimize this type of effect?	Nicole Shultz	live answered	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.
Is it possible to see a list of participants? Thank you.	Anonymous Attendee	The list of participants will be part of the project record and included in the scoping report.	
How would this affect the amount of land available for public recreation?	Nicole Shultz	live answered	
Some citizens are concerned about turbines possibly being installed on the historic footprint of the Minidoka WWII Japanese American confinement site. How will those concerns be addressed?	Hannah Ashton	live answered	

Question	Asker Name	Answer(s)	
Where would this energy be going? What population of what country/state would be benefiting from it?	Nicole Shultz	live answered	
Hello, How many attendees are there today?	Anonymous Attendee	There are currently 100 attendees.	
What are you doing to engage nonwhite folks in this project? How many people of color are involved in the staffing and implementation/decision making roles of this process?	Bif Brigman	live answered	
Is there a way to set up a face to face meeting with Luke at MVE ?	Gordy Gates	Magic Valley Energy can be contacted at info@magicvalleyenergy.com .	
What other sites did you consider? I couldn't find the appendices that were referred to in your work plan. How did you come to choose this site? Are there other possible sites?	Julie Abo	Thank you for submitting your question. We hope Luke Papez's response answered your question. You can contact Magic Valley Energy at info@magicvalleyenergy.com with additional questions about the project.	
This project encompasses a large acreage of public lands. Since the project infrastructure is still in the planning stage, have options for avoiding visual impacts on the Minidoka NM viewshed been fully explored.	Anonymous Attendee	Thank you for submitting your question. We hope the BLM's response answered your question. For more information contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager by Phone: 208-732-7204 E-mail: kprestwich@blm.gov . Project website: https://go.usa.gov/xFKxg	
The project calls for up to 400 wind turbines. What is the most probable number of turbines?	David Sakura	live answered	
If none of the material is usable on-site it will strain the current supply for housing and road construction. this impact must be evaluated to determine the financial burden put on the local market.	Adrienne Woods	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
For the mapping, is there a way that BLM could depict: (1) Minidoka National Historic Site, a unit of the National Park System; (2) the "inside the fenceline" footprint of the Minidoka WRA site including the barracks blocks and administrative facilities; (3) the larger camp footprint which includes both the "inside the fence" barracks and the agricultural fields associated with the camp -- approximately 30,000 acres, as depicted in the NPS's Confinement and Ethnicity book?	Anonymous Attendee	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	

Question	Asker Name	Answer(s)	
Where are the visual simulations? What is this going to look like from Historic sites? When can we expect to have these? How will they be distributed beyond those proposing this project?	Bif Brigman	live answered	
Will private land be used for siting in addition to the BLM lands?	Anonymous Attendee	live answered	
Are you aware that your proposed location is next to a National Historic Site? Are you aware that Japanese Americans were imprisoned there? Are you aware that I was a prisoner there in 1942-3? Are you aware that this is sacred land? Find another location. Paul H. Tomita	Paul Tomita	live answered	
Will the Lava Ridge EIS process be conducted under the Trump NEPA regulations, or the 1978 NEPA regulations?	Elizabeth Merritt	live answered	
Were the Shoshone-Bannock Tribes invited to be a cooperating agency?	Kelly Fuller	live answered	
What are the rules and regulations regarding the impairment of resources? How is that information being distributed to concerned community members?	Bif Brigman	live answered	
Please explain how you will accommodate existing laws that protect wildlife, including the Endangered Species Act, the Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act. How will you gather data to assist the decision process or mitigation measures (i.e.....more underground power lines due to migrating sandhill cranes, trumpeter and tundra swans.)	Patricia Weber	live answered	
Will the turbine field be sold after it is up and running? Who benefits from the direct profits from the farm?	Julie Abo	live answered	
In addition to the sacred Japanese American sites, what about the Shoshone-Bannock sites located across the area?	Anonymous Attendee	live answered	
I am also very interested in a 3D visual rendering of this project to full appreciate daytime and nighttime simulation of the viewshed for the region.	Julie Abo	Thank you for your comment. This meeting is focused on responding to questions. To make sure the BLM has a record of your comment, please submit it in writing. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	

Question	Asker Name	Answer(s)	
Will the project need an eagle take permit or an ESA-related Incidental Take permit?	Kelly Fuller	live answered	
Is there sage-grouse PHMA in the project area?	Kelly Fuller	live answered	
I tried that. No one contacted me. Hoping for another option	Gordy Gates	The best method of contacting Magic Valley Energy is through email at info@magicvalleyenergy.com . Thank you.	
When does BLM expect to publish the DEIS, FEIS, and Record of Decision?	Kelly Fuller	live answered	
How much tax revenue will this project generate for the local communities?	Ruben Vasquez	live answered	
What outreach has been made in the community? I just found out about the NOI a few days ago. Can there be an extension of the public comment period to give the community time to respond?	Julie Abo	Thank you for your question. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
What is the benefit for local residents? Where is the power going?	Ashley Van Tassell	Thank you for submitting your question. We hope Luke Papez's response answered your question. You can contact Magic Valley Energy at info@magicvalleyenergy.com with additional questions about the project.	
This is a wintering area many animal populations. Have any considerations been made for the loss of habitat in these wintering areas. I am also concerned about the added human presence stressing these animals during the winter months. Has this been considered?	Jeremy Caywood	live answered	
what happens if a bird of prey is killed?	Adrienne Woods	live answered	
How many jobs will this project create for the community? during and after the project?	Ruben Vasquez	live answered	Thank you for submitting your question. We hope Luke Papez's response answered your question. You can contact Magic Valley Energy at info@magicvalleyenergy.com with additional questions about the project.
How many sage-grouse leks are in the project area?	Kelly Fuller	live answered	

Question	Asker Name	Answer(s)	
The Paul Y. Tomita family were imprisoned in the Minidoka/Hunt Camp, Block 12 Barracks 5 Section E. Grandma Tomita was the last to leave in October, 1945, almost 4 years. This is sacred land, folks. FIND ANOTHER LOCATION. Paul H. Tomita	Anonymous Attendee	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
How long will the windmills, if they are erected, be functioning? What will happen to the windmills when they are no longer working? Will there be more put up in there place?	Ashley Van Tassell	live answered	Thank you for submitting your question. We hope Luke Papez's response answered your question. You can contact Magic Valley Energy at info@magicvalleyenergy.com with additional questions about the project.
Will this project curtail the wind turbines when eagles or raptors approach? If so, will human monitors be used or will the curtailment be automated?	Kelly Fuller	live answered	
What is the overall hight of the turbines including the blade height	Nick Wilcox	MVE anticipates using turbines with a hub height of 260 to 460 feet and total height of 390 to 740 feet when the rotor blade is at its highest point.	
Will wind turbine start up speeds be adjusted to project bats?	Kelly Fuller	live answered	
How much of a response did you get from your outreach efforts? Who responded?	Julie Abo	live answered	The scoping period is from August 20 to September 20, 2021. Further information about the scoping process and project updates can be found on the project website at https://go.usa.gov/xFKxg . For more information contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager by Phone: 208-732-7204, E-mail: kprestwich@blm.gov , or Project website: https://go.usa.gov/xFKxg .
Oops, typo in my previous question. Will wind turbine start up speeds be adjusted to protect bats?	Kelly Fuller	live answered	
Perhaps I'm not understanding the process, but I have a concern about the potential of a private company profiting from public lands. I know that Idaho Power must provide recreational opportunities as part of their licensing. Will there be similar requirements for MVE?	Angie Lakey-Campbell	live answered	
How is this project being funded? Federal taxpayer funds ? Federal subsidies? What assurances are there that this project won't become another Solindra?	Joan Hurlock	live answered	
How will this impact the Pheasant population?	Anonymous Attendee	live answered	

Question	Asker Name	Answer(s)	
Who and how will the comments be evaluated. Will all comments be made public for transparency?	Mary Abo	live answered	
Groups who you can include in your outreach: The Minidoka Pilgrimage Committee, the Japanese American Confinement Sites Consortium, The descendants of survivors of the Minidoka Japanese American incarceration (Minidoka NHS). The Shoshone-Bannock Tribe.	Julie Abo	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
It was previously stated that all windmills will be placed at least a mile away from all residential property, however most people can easily see over 10 miles in all directions from their homes. How is this supposed to help the scenic issue? Has it been considered to place all windmills at least 1 mile from all privately owned ground instead of residential areas?	Ashley Van Tassell	live answered	
If there is enough opposition to this project, can it be stopped?	Joan Hurlock	live answered	
So the long term economic benefits on the output of the wind farm will not go to Idaho, just the construction?	Karl Endo	live answered	
When will you know who will contract for this power? It seems this question should be answered now, as the effects will definitely be felt locally. It seems unfair to provide only a vague answer to this question. Our local BLM is at stake, we have a right to know how this is to be justified.	Nicole Shultz		
This question is for LS power "What is the benefit to the public, of putting the project on public land as opposed to building it on private property."	John Arkoosh	live answered	
Will there be a in-person meeting with the public concerning this topic where actual conversation can take place?	Anonymous Attendee	live answered	

Question	Asker Name	Answer(s)	
People in my extended family were incarcerated at Minidoka (Igarashi). Find alternate sites, as you are required to do under NEPA. Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve. This needs to be a very comprehensive environmental review, with Native American and Japanese American consultation, along with other key stakeholders. This proposal will harm the historic and cultural landscape. You are proposing this without a study on potential users? Then, the review needs to include a comprehensive analysis of the financial aspects, short term construction jobs vs longterm jobs, credible potential markets, and cost of potential harm to the environment and cultural resources. Much more public participation is needed, with ADVANCE notice to groups. This was very short term public notice.	Mary Urashima	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Will the placement of the turbines cause restricted public access to the area and surrounding land?	Sam Sites		
How will the local communities benefit from taxes when the land is federal land?	Joan Hurlock	live answered	
Question: There was minimal public notification with very short notice. Can you extend the comment deadline and hold more online workshops to ensure the interested stakeholders can participate?	Mary Urashima	live answered	
Will the public be able to comment on the proposed eagle take permit during the DEIS comment period?	Kelly Fuller	live answered	
Are aircraft warning lights triggered only when needed (by radar) under consideration, as opposed to lights that stay on all night?	Chris Anderson	live answered	
I notice that the questions you are choosing to address are everything "except" the importance to we Japanese Americans. Too "hot" for you folks, huh? Paul H. Tomita	Paul Tomita	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	

Question	Asker Name	Answer(s)	
With the size of the farm, will the impact statement include noise pollution values?	Karl Endo	live answered	
Physiological experiments on humans have shown that noise of a moderate level acts via indirect pathway and has health outcomes similar to those caused by high noise exposures on the direct pathway. The indirect pathway starts with noise-induced disturbances of activities such as communication or sleep.	Anonymous Attendee	Thank you for your comment. This meeting is focused on responding to questions. To make sure the BLM has a record of your comment, please submit it in writing. Comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Thank you. I will try again	Gordy Gates		
What is the process to formally request an extended public comment period?	Mary Urashima	For additional information contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager by Phone: 208-732-7204, E-mail: kprestwich@blm.gov , or Project website: https://go.usa.gov/xFKXg .	
The presentation indicated the wind turbines will range in size from 400 to 740 feet in height. Will one size/height be selected? If so, when will that decision be finalized and announced? Evaluating for a 400 foot tall turbine versus a 740 foot turbine is very different.	Anonymous Attendee	live answered	
How will Native American Traditional Cultural Properties (TCPs) be identified and protected?	Anonymous Attendee		
It is really difficult to believe your speakers related to Minidoka NHL and yet your outreach is so poor! You have thousands of contact for stakeholders for over 20 years from NPS... it's inexcusable you have been working on this for a year and yet the vast majority only became aware with the BLM press release!	Bif Brigman	Thank you for your comment. This meeting is focused on responding to questions. To make sure the BLM has a record of your comment, please submit it in writing. Comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
What is of concern to many descendants and survivors, is that there are several turbines proposed on the historical footprint of the Minidoka historical site (which is different from the NHS). There is also a sound impact of a sacred place, not only visual.	Julie Abo		
And are you telling us Sage grass have affected this process but impacting a National Historic Site doesn't?	Bif Brigman		

Question	Asker Name	Answer(s)	
Symptoms of wind-turbine syndrome might include headaches, sleep problems, night terrors, ringing in the ears, mood problems, concentration and memory problems, and issues with equilibrium, dizziness, and nausea. These health issues have been reported in residents with windmills up to two miles from homes. What programs will be in place to ensure that if health issues in communities arise due to the windmills they will be properly addressed?	Anonymous Attendee		
Will there be labor requirements (local hire, project labor agreements, or apprenticeship utilization, etc.) included on the ppa or the proposal?	Anonymous Attendee		
Has another wind turbine company made a proposal? Is MVE the only company considered? No competing proposals?	Mary Abo		
Consulting with tribes is not the same thing as inviting them to be a cooperating agency. Cooperating agencies get early access to the DEIS, for example.	Kelly Fuller	Thank you for your comment. This meeting is focused on responding to questions. To make sure the BLM has a record of your comment, please submit it in writing. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Your group are obviously discounting the importance of the location to we Japanese Americans. We need to talk with other people. Paul Tomita	Paul Tomita	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352	
The answer to my question about whether the Shoshone-Bannock Tribes were invited to be a cooperating agency didn't actually answer the question because it was about consultation, not about being invited to be a cooperating agency. So I ask again, were the Shoshone-Bannock Tribes invited to be a cooperating agency?	Kelly Fuller		
Asking again. What is the official public comment period, when did it open, when does it close? Did you only propose a 30 day public comment period for this project?	Mary Urashima	The scoping period is from August 20 to September 20, 2021. Comments must be postmarked by September 20, 2021.	

Question	Asker Name	Answer(s)	
Cody did not answer the diversity question! Should we assume no PoC are involved in the process and decision making?	Bif Brigman		
If there are several similar organizations, is it better to register everyone as a consulting party (under section 106) or have one organization speak as a representative.	Anonymous Attendee	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Will the scoping posters that are being shown during this Q & A session be available on ePlanning after this presentation?	Kelly Fuller	Yes, presentation materials including the scoping posters are available for download on the project's ePlanning website at https://go.usa.gov/xFKXg .	
Do wind farms have a "life" span, if so what happens to the roads, turbines, stations, etc. at the end of the life.	Anonymous Attendee		
For LS power "What is the benefit to LS power of building on the public land as opposed to building it on private property." Have you proposed any other projects in southern Idaho? If so where and how large?	John Arkoosh		
Again, Mr. Papez refers to the size of the "contract" determining the number of turbines, but since he won't say where the energy would be contracted to, it's really a non-answer. Very disappointing!	Nicole Shultz	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Is it possible to change the footprint of the farm?	Julie Abo		
Will the EIS analyze cumulative impacts?	Kelly Fuller		
Who do we need to talk to to get an in-person meeting with the public scheduled before the commenting period closes?	Anonymous Attendee	For more information contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager by Phone: 208-732-7204 E-mail: kprestwich@blm.gov Project website: https://go.usa.gov/xFKXg	
What is the footprint of each turbine?	Anonymous Attendee		
Due to the incredibly short window for public comment period? How do we request an extension, especially if you are not engaging a diverse group of the people being impacted?	Bif Brigman		

Question	Asker Name	Answer(s)	
I am requesting a 60 day extension of the public comment period. Two scoping hearings is insufficient due to the impacts on environment and historic/cultural resources. Also, those who are interested parties regarding Minidoka are spread across the US. You need to allow time for public information to be disseminated to families of the incarcerated. I request you coordinate a scoping hearing with the Japanese American National Museum, Densho, and Japanese American Memorial Pilgrimages.	Mary Urashima	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
We understand and can appreciate that you make an effort for outreach, but it is clear that some people have been left out. So what is your response to that?	Julie Abo		
Why big ugly wind turbines that kill bats and birds? Why can't you develop and build thorium nuclear reactors? They are a source of cheap, clean energy and have a minimal impact on habitat and the environment.	Joan Hurlock		
It would be great to have a list of everyone who has been consulted.	Julie Abo		
Respectfully folks, your outreach sounds like it has been very localized, e.g. local open houses, local media. Again, interested parties for Minidoka are spread across the country.	Mary Urashima	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Your outreach responses are highly flawed. This project involves more than residents of Idaho. The private project profiteers saying they are committed to outreach is ridiculous	Bif Brigman	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
The question was how do citizens request an extension, not whether y'all think there should be one!	Bif Brigman		
It doesn't sound like MVE has contacted Minidoka stakeholders as if it doesn't realize its historical significance. Please find time to reach out and even visit the site.	Mary Abo		

Question	Asker Name	Answer(s)	
BLM. The Bureau of Land Management. A "federal" agency. The BLM does not know the importance of National Historic Site's? Paul Tomita	Paul Tomita		
Where are alternative sites you will consider?	Bif Brigman		

Attendees

A Kayser	Joan Hurlock
Adrienne Woods	Joann Rutler
Alex Shinkawa	John Arkoosh
Alycia Bean	John Chatburn
Amy Schutte	John Crozier
Andy Dunn	Josh Johnson
Angie Lakey-Campbell	Joshua Uriarte
Anna Tamura	Judy Ruprecht
Ashley Van Tassell	Julie Abo
Aubrey Newton	Karl Endo
Bif Brigman	Kelly Fuller
Bradley Dawson	Kirk Ruby
Brenda Pace	Kristy Torres
Chris Anderson	Kurt Ikeda
Cody Cantrell	Lara Rozzell
Connie Masuoka	Lena Lee
Craig Gowdey	Lindsay Johansson
Curtis Willis	Maki Jackson
Dainee Gibson-Webb	Mark Southwick
Dan Sakura	Mary Abo
Dave Price	Mary Urashima
David Dillon	Micki Kawakami
David Magdangal	Mike Mathews
David Malarchik	Mitch Silvers
David Rollheiser	Nick Wilcox
David Sakura	Nicole Shultz
David Wilson	Nori San
Don Davis	Patricia Weber
Donald Davies	Paul Tomita
Ed Brune	Peggy Beltrone
Eileen	Rebecca Wildman
Elizabeth Merritt	Rick Cantor
Emily Her	Rick Hollenbaugh
Fonda Portales	Rourke OBrien
Fred Decker	Ruben Vasquez
Garret Visser	Ryan Robertson
George Lynch	Sam Sites
Gordon Brittan	Samantha Marshall
Gordy Gates	Scott Draper
Hannah Ashton	Scott Wilson
Holly Sandbo	Stephanie Toothman
Ida Clark	Steve Fischer
James Carkulis	Steve vanzandt
Janet Keegan	Tara Hagen
Janet Komoto	Tor Ulstein
Jared Infanger	Wade Vagias
Jeffrey Lebsack	William Schrader
Jeremy Caywood	Zack Lanier
Jillian Hanson	

Others Attended: 6 participants joined by phone, name not recorded

Zoom Webinar Report: September 9, 2021 BLM Public Scoping Meeting, Lava Ridge Wind Project

Question	Asker Name	Answer(s)	
Can we know who is participating in this meeting and how many people? Thank you	Julie Abo	There are currently 54 attendees. The list of participants will be part of the project record and included in the public scoping report.	
Hi! How many participants are there?	Anonymous Attendee	There are currently 55 attendees.	
Should people submit the questions they ask tonight in a separate email to be part of the public record?	Julie Abo	Questions submitted in this meeting will be reviewed by the BLM, however, submitting questions and comments in writing allows the BLM to consider them as part of the formal record. Formal comments can be submitted online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Are any tribes or any Japanese American organizations identified as collaborating or cooperating agencies?	Bif Brigman	The Shoshone-Paiute and Shoshone-Bannock Tribes prefer to be engaged through government to government consultation with the Twin Falls District. These meetings have been occurring. We are interested in engaging Japanese American organizations in the project too and have reached out to the the National Park Service for their list of partners at Minidoka.	
How many attended yesterday?	Rebecca Wood	Approximately 109 people attended yesterday's meeting. More information will be available as a part of the project record and included in the public scoping report.	
Yesterday during the Q and A part, a white committee member said that when he approached a Shoshone tribal representative about the location of this project next to Minidoka/Hunt Camp, he said that representative said the location was OK. Interesting that a people who covet sacred land would discount the importance of sacred land of we Japanese Americans, another minority group. Paul H. Tomita (Survivor and former prisoner at Minidoka/Hunt Camp, Block 12 Barracks 5 Section E, and grandma who was imprisoned for over 3 years, for having a Japanese face)	Paul Tomita	The Shoshone Field Office has had multiple conversations with Tribal members about the Lava Ridge Wind Project and they have expressed concern about the whole project.	
Thank you.	Anonymous Attendee		
what does providing power for "western states" mean? will power be exported out of Idaho?	Thomas Koto	live answered	

Question	Asker Name	Answer(s)	
is this a project simiar to wind projects in oregon, providing carbon tax exemptions to California corporations?	Thomas Koto	live answered	
Rather CO2 credits	Thomas Koto	live answered	
Will this project be subject to federal Davis-Bacon/prevaling wage laws, due to its location on public land?	Ryan Nielsen	live answered	
will you share a copy of these notes ?	Theogene Mbabaliye	The presentation and related project documents are available on the project website at https://go.usa.gov/xFKxg . A public scoping summary report will also be available.	
or are accessible at the project site?	Theogene Mbabaliye	Yes, thank you. The project website can be accessed at https://go.usa.gov/xFKxg .	
Can we get copies of the presentation?	Anonymous Attendee	The presentation and related project documents are available on the project website at https://go.usa.gov/xFKxg .	
what is the projected % amount of energy is projected to be shipped out of state?	Thomas Koto	live answered	
How much power would remain in Idaho?	Brenda Mitchell	live answered	
How was the proposed project location chosen and who was involved in that process? Are there alternative project locations?	Mika Rothman	live answered	
Given the majority of the project is proposed to be on BLM land, what will be the status of public access be within the project area, particularly during hunting seasons?	Garret Visser	live answered	
So basically the power will go to the highest bidder, which would never be Idaho.	Joan Hurlock	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
How will stray voltage be addressed? There are a lot of dairys on the north side and the effects of stray voltage are substational. Adding this much more energy into the area seem detrimental.	rodeo247	live answered	
Will this drive down the current going rate of power being generated by any of the hydro power plants even those privately owned ?	Russ Isaak	live answered	
Will you know who is buying the power before the end of the EIS is completed.	Brian Ahrens	live answered	

Question	Asker Name	Answer(s)	
Will we be able to see the analysis by the Magic Valley Energy of why this location and the configuration are the optimal location? Wind source, etc?	Julie Abo	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
Are solar farms considered which would be less invasive than one of the largest wind farms in the WORLD.	Mary Abo	live answered	
Thanks	Theogene Mbabaliye		
Also, how is it even possible to use the BLM for a private entity? Shouldn't they have to purchase the land? BLM is reserved for preservation and it just seems unnatural for it to be filled with turbines.	rodeo247	live answered	
what measures or mitigation will be taken to protect bats, birds, sage grouse, antelope and deer both habitat and potential lethal effects?	Brenda Mitchell	live answered	
So the BLM will be renting usage of these acres to Lava Ridge Wind Project? Who will receive these funds?	Marleen Wallingford	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
In your outreach to date, how many public notices have you placed in Native and Japanese American community centered media? How many general notices placed outside the state of Idaho?	Bif Brigman	We consult directly with the Shoshone-Bannock and Shoshone-Paiute Tribes on all our federal actions. We hope to develop a similar relationship with Japanese Americans concerning impacts at Minidoka and we are working directly with the National Park Service to acquire the contacts.	
Can you say that again about the sage grass for this location?	Julie Abo	Thank you, we hope the BLM's response addressed your question about greater sage-grouse. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
How is tax revenue generated for local communities? Is it from sales tax that would be collected from the project construction workers that are spending money in local communities or is tax revenue generated in a different way?	Joan Hurlock	live answered	

Question	Asker Name	Answer(s)	
What was the consideration and approach when you learned about the Minidoka National Historic Site? Since you started some years ago.	Julie Abo	live answered	
Have you studied the impact on the Minidoka Historical Site specially as it relates to assessment of adverse affects under	Ed Tanaka	live answered	
Are you working with the different departments at CSI, to help with these studies? If not why not? How might CSI benefit from this wind project?	Eli Bowles	live answered	
Given that there is a shortage of construction workers in our area, where would the workers be coming from? From out of state?	Joan Hurlock	live answered	
Yes, thank you for answering my question about the sage grouse.	Julie Abo		
At the end of the windmill's life span, who is responsible for clean-up and where will it be disposed of? Locally?	Wayne Frasure	live answered	
It seems that the project has been very respectful of the sage grouse. Are similar steps being taken to ensure that the Minidoka National Historic Site is protected and respected?	Amy Tanaka/Trotter	live answered	
Question #1: How many megawatts of power will be generated in total? Question #2: To understand scale is it true that the towers will be up between 560 and 740' tall? How will you finally decide how tall to make the towers?	Jon Ochi	live answered	
My question that remains unanswered from yesterday How many people of color are involved in the staffing and implementation/decision making roles of this process? What are you doing to engage nonwhite folks in this proposed project?	Bif Brigman		
Where do the investors in this project reside? Out of state or in Idaho?	Joan Hurlock	live answered	
Have you studied the impact on the Minidoka Historical Site especially as it relates to assessment of adverse affects under 36 CFR 800.5 (v)Change of the character...(v)Visual Atmospheric, audible elements that diminish the properties significant historic features?	Ed Tanaka	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	

Question	Asker Name	Answer(s)	
As of 2005 Idaho Powers grid was already outdated and leaking stray voltage. Dairys are highly susceptible because of their use of metal pens which are conductors for electricity. Will Idaho Powers grids also be upgraded?	rodeo247	live answered	
Do you have better maps available? The maps on the website do not allow one to see the placement well.	Emily Hanako Momohara	live answered	You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager for further information (Phone: 208-732-7204; E-mail: kprestwich@blm.gov; Project website: https://go.usa.gov/xFKxg .) to obtain additional detail.
How will livestock grazing leases be impacted by this project?	Nick Westendorf	live answered	
Who are the potential contractors? A billion dollars seems like a lot of money to invest without knowing who the buyers of the energy are.	Joan Hurlock	Thank you for submitting your question. We hope Luke Papez's response answered your question. You can contact Magic Valley Energy at info@magicvalleyenergy.com for more information about the project details.	
How was the size (number of turbines, area, etc.) determined, by whom, and can the area(s) and number of turbines be reduced?	Anonymous Attendee	Thank you for submitting your question. We hope Luke Papez's response answered your question. You can contact Magic Valley Energy at info@magicvalleyenergy.com for more information about the project details.	
M.V. Energy: the massive wind turbines will be located directly in view of the Minidoka Monument, one of Idaho's most significant historic sites, as well as a place of pilgrimage. How does M.V. Energy address concerns regarding the project's adverse impacts on cultural resources & visual resources?	Ron James	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov; Project website: https://go.usa.gov/xFKxg .) to obtain additional detail.	
on resources to be analyzed, i didn't see water resources and wetlands, they don't exist in the planning area or turbines will be upland only?	Theogene Mbabaliye	live answered	
How much income does the BLM anticipate receiving for your general fund from the wind project?	Marleen Wallingford	live answered	
Question to BLM. Are you aware of what a NATIONAL Historic Site means? What about PROTECTION of National Historical Sites? You are a "national" agency aren't you? Paul Tomita	Paul Tomita	We appreciate you taking time to participate in the public scoping process. Your input helps inform the BLM's analysis of the proposed project. You can submit comments online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	

Question	Asker Name	Answer(s)	
How much is Magic Valley Wind offering impacted communities in annual mitigation if your proposed project goes forward? For how long?	Bif Brigman	Thank you for submitting your question. We hope Luke Papez's response answered your question. You can contact Magic Valley Energy at info@magicvalleyenergy.com for more information about the project details.	
This project area has many important archaeological sites, including Wilson Butte Cave, which had human occupation over a span of about 15,000 years. It is one of the most significant sites in North America. How will MVE protect archaeological resources? Will MVE hire additional BLM archaeologists to monitor construction sites?	Shauna Robinson	live answered	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKxg .) to obtain additional detail.
Southern Idaho is a beautiful place and the size of these wind turbines would create an eye sore for a massive area potentially from Pocatello all the way to Mountain Home , would you please consider taking your find farm away from our state ?!!	Anonymous Attendee	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
What considerations were given to the impacts — setting, feeling and association — on the NPS Minidoka National Historic Site? It appears that portions of the project structures will be visible from this major national Historic Site. In this vast region, what boundary adjustments might be made for alternatives that do NOT negatively encroach on the site.	Barbara Takei	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKxg .) to obtain additional detail.	
Can you elaborate on what steps are being taken to engage the Japanese American community, in and outside of Idaho?	Lauren Waude	live answered	
Before we moved into this area an abundance of wildlife grazed this area so its easy to understand the cattle grazing rights. What are some other multiuses besides hunting the BLM is used for?	rodeo247	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKxg .) to obtain additional detail.	
What is the life expectancy of turbines and decommission process?	Lara Miller	Thank you for submitting your question. We hope Luke Papez's response answered your question. You can contact Magic Valley Energy at info@magicvalleyenergy.com for more information about the project details.	

Question	Asker Name	Answer(s)	
Companies like Chobani had a time waiver until the taxes are paid, is this the same for MVE?	Eli Bowles	live answered	
Considering that the Japanese Americans forcibly removed to Southern Idaho were originally from Oregon, Washington, Alaska, and California and were further displaced to the interior US when leaving Minidoka, what outreach is being done to ensure that the relevant communities are aware of this project in time to submit comments?	Mia Russell	live answered	
Mike Courtney I asked questions requiring numerical answers	Bif Brigman		
Where will all the concrete come from to erect these wind turbines and how many tons per unit?	rodeo247	live answered	
Are the windmills made in the US? Or are they made in a foreign country?	Wayne Frasure	live answered	
Section 106 National Historic Preservation Act: Congressional approval of Minidoka as a historic site is our government's acknowledgement of mistakes made by military and governmental agencies during WW2. BLM decision to go ahead with MVE's huge project would be a grave mistake again. 4 million dollars a year, desecration of 78,000 acres, dismissal of Minidoka's consideration seem like obstacles that have to be addressed.	Mary Abo	Thank you for your comment. Please provide this comment in writing to be considered in the formal record online, by email, or by mail. Comments can be submitted online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Did you visit the visitor's center and go on a tour? There are several groups involved.	Julie Abo	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKxg .) to obtain additional detail.	

Question	Asker Name	Answer(s)	
With today's focus on racial equity, teaching truth and critical race theory, we're surprised and shocked that this is being proposed—if due diligence had been done, this would not be a location for something that so gravely alters the authentic interpretation and experience of this culturally significant historic site—and a site of shame and a site of conscience at that. The power of place is immeasurable. So with that in mind, regarding a cooperating or collaborating agency and the desire to engage Japanese American organizations, how does participation provide opportunity to affect the outcome? In other words, is there "teeth" to engagement? Lynn Fuchigami Parks, Executive Director, Japanese American Museum of Oregon.	Lynn Fuchigami Parks	live answered	
Will all residents within a certain radius of this project receive a letter in the mail to inform them? I know that there have been articles in the newspaper. (None which I've seen published) but I think a greater outreach to the locals needs to be made so they don't get blindsided.	rodeo247	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
Who else besides FoM? 10,000+ people were imprisoned there!	Bif Brigman	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
Regarding noise level, how many decibels of propeller sound can be measured and at what distance?	Jon Ochi	live answered	Thank you for your question. We hope SWCA's response addressed your question. For more information, please contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager by Phone: 208-732-7204, E-mail: kprestwich@blm.gov , or Project website: https://go.usa.gov/xFKXg .
Your explanation on including the Minidoka Historic Site up to now is PATHETIC and WEAK. I don't see ANY Japanese American participation. Paul Tomita	Paul Tomita	We appreciate you taking time to participate in the public scoping process. Your input helps inform the BLM's analysis of the proposed project. You can submit comments online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	

Question	Asker Name	Answer(s)	
Where are the visual simulations? What is this going to look like from Historic sites? When can we expect to have these? When can we expect them? Date? How will they be distributed beyond those proposing this project before public comment opportunities?	Bif Brigman	live answered	
What is the timeline for this project in terms of years?? both the EIS process and the entire project?	Anonymous Attendee	After the scoping period ends, it will take about 6 months for the BLM and its contractor to prepare a draft EIS. The draft EIS will undergo review by the BLM and Cooperating Agencies. Then, the public and interested parties will have an opportunity to review and comment on the draft EIS. It will then take another 4 months or so to prepare a final EIS. Based on the preliminary project schedule, the BLM anticipates releasing the final EIS in late 2022. The operational lifespan of the facility, if constructed, would be approximately 30 years.	
What are the rules and regulations regarding the impairment of resources? How is that being accessed by each agency? How is information related to impairment of resources being distributed to concerned community members? How is compliance built in to your work?	Bif Brigman		
There are some people who couldn't make this meeting. Can they watch the recording?	Julie Abo	A link to the recording of today's meeting will be posted to the project's website at https://go.usa.gov/xFKxg .	
It SMELLS like you folks were attempting to SNEAK this project from under our "Asian" noses. Is that true?Paul Tomita	Paul Tomita	We appreciate you taking time to participate in the public scoping process. Your input helps inform the BLM's analysis of the proposed project. You can submit comments online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
It's alarming that negative impacts on the NPS Minidoka Historic Site, a national historic and cultural treasure, have not been given attention in the draft EIS that the sage grouse received.	Anonymous Attendee	We appreciate you taking time to participate in the public scoping process. Your input helps inform the BLM's analysis of the proposed project. You can submit comments online at https://go.usa.gov/xFKxg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	

Question	Asker Name	Answer(s)	
How would the project impact the grazing permits? Will the EIS consider any changes to grazing and how those would affect wildfire potential?	Anonymous Attendee	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
What state is the parent company located?	Brenda Mitchell	Magic Valley Energy, LLC or MVE, is the project applicant. MVE is a subsidiary of LS Power. LS Power is a company headquartered in New York focused on power generation, electric transmission and energy infrastructure.	
Is the mailing address for MVE in Chesterfield, Missouri, not Twin Falls? I read that the headquarters for LS Power is in New York City.	Shauna Robinson		
As the official representative of the Minidoka Pilgrimage, we are requesting instructions on filing a formal complaint about the outreach to date. So far we see your scoping phase to be heavily flawed. It doesn't imbue confidence or bode well for upcoming phases. Not one JA cooperating agencies... no Native tribes as cooperating agencies. How are citizens to have faith in your process. How do we file an official request for an extension for public comment?	Bif Brigman	Please send your request to Kasey Prestwich at address listed on the comment slide.	
Which NEPA process will BLM follow for this project? The Sept 14 or earlier NEPA requirements?	Theogene Mbabaliye	live answered	
Sept 14, 2020. sorry!	Theogene Mbabaliye	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
Will you provide maps that show the project overlaid with the current and historic property associated with Mindioka National Historic Site?	Mia Russell	live answered	

Question	Asker Name	Answer(s)	
If you choose to propose siting your project where it will clearly impair the resources of a National Historic Landmark site - the outreach should be national... the outreach efforts so far demonstrated by both the private, for profit energy company, as well as the Federal agencies falls short. Why are none of you doing outreach nationally?	Bif Brigman	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
is there any possibility that Magic Valley Energy would sell the wind turbines to another company before the end of their useful life?	Ed Tanaka	live answered	
How would MVE finance the 1 billion cost of the 400 turbines?	Mary Abo	live answered	
Are you people attempting to literally "BURY" the white man's WWII Mistake by covering the entire site with tall windmills? Paul Tomita	Paul Tomita	We appreciate you taking time to participate in the public scoping process. Your input helps inform the BLM's analysis of the proposed project. You can submit comments online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov, or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
Will BLM make available project GIS files (ESRI shapefiles or compable format) for download and where will those files be available for download?	Anonymous Attendee	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
What is BLM's rental rate per acre?	Marleen Wallingford	Marleen, Please send me an email (kprestwich@blm.gov) and I will follow-up with detail.	
there are many hydro PURPA projects located on canal systems in the area. will this drive down the revenue to these none profit originizations as they relicence their hydro sites	Anonymous Attendee	live answered	
Multiuses for profit? You had mentioned that besides grazing and hunting the BLM has other uses for profit that are allowed? (refering to earlier question)	rodeo247	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
Will these windmills affect over the air broadcasts like TV and radio?	Wayne Frasure	live answered	

Question	Asker Name	Answer(s)	
Since Idaho most likely won't be the beneficiary of the energy, why not build your wind farm in the states that will be buying the energy? Did you think Idahoans, Japanese-Americans, and Native Americans wouldn't mind the destruction of our public lands?	Anonymous Attendee	We appreciate you taking time to participate in the public scoping process. Your input helps inform the BLM's analysis of the proposed project. You can submit comments online at https://go.usa.gov/xFKXg , via email at BLM_ID_LavaRidge@blm.gov , or by mail to Kasey Prestwich, Project Manager, BLM Shoshone Field Office, 400 West F Street, Shoshone ID 83352.	
I'm happy to hear that NPS and Friends of Minidoka are involved. There are many historic assets in the area that are not protected by NPS (which are not within the park boundary). What care will be taken to keep the integrity any cultural materials outside Minidoka National Historic Site?	Emily Hanako Momohara	Thank you, we hope the BLM's response addressed your question. You can contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager (Phone: 208-732-7204; E-mail: kprestwich@blm.gov ; Project website: https://go.usa.gov/xFKXg .) to obtain additional detail.	
In retrospect to the turbines in Mt. Home. How does the size (height) of these compare to those?	rodeo247	live answered	
Are we to understand that the comment period for the Lava Ridge Wind Project scoping does not end on September 20, 2021? Will BLM continue accepting comments for inclusion in the EIS until further notice, or does it make sense to extend the deadline for another 30 or 45 days?	Barbara Takei	live answered	
How many lights will be on each turbine? Will the lights flash? How many hours per day will the lights be operating?	Jon Ochi	live answered	
If a group wanted to pursue legal action should they not agree with the final EIS and they didn't have time to submit comments during scoping would they have legal standing to do so and if not will you extend the comment period so those just learning about the scoping period have time to comment?	Anonymous Attendee		
You had previously stated that \$80-plus million dollars of sales and use taxes would be generated from the purchase of the material and equipment for this project-what state or states is this equipment and material purchased from? Would those states be where that tax money would go to?	Joan Hurlock		

Question	Asker Name	Answer(s)	
Could the BLM come out with a document that could be shared on Facebook? I have tried sharing information on this project and Facebook fact checkers have removed the post for false information even though I was just sharing the letters that were sent to my neighbors.	rodeo247	live answered	
How will this project impact local fire departments? Also are there any HAZMAT concerns local fire departments will have to mitigate?	Nick Westendorf	live answered	
Are there sound simulations? So people know what is being proposed	Bif Brigman	The noise study estimating sound levels and the distance to which project sound will be audible from the project will be available to the public with the Draft EIS. This study will include sound modeling results.	
If you find that there are adverse affects is moving the wind turbines to a different location a possible alternative?	Ed Tanaka	live answered	
How much did Ellis receive in PPE money?	Bif Brigman		
Would all of the corridors be enclosed with fencing?	Shauna Robinson	The corridors will not be fenced. Some operations and maintenance sheds and substations will be fenced for public safety. The project area will largely remain open to the public.	
contact me at lizamora@tfcanal.com on the purpa items.	Anonymous Attendee	Thank you, please contact Kasey Prestwich, Lava Ridge Wind Project EIS Project Manager by Phone: 208-732-7204, E-mail: kprestwich@blm.gov, Project website: https://go.usa.gov/xFKxg .	
In reference to the question about consideration of cultural resources. What are some of the mitigations for cultural resources that you keep referring to? For example—?	Julie Abo		
Is there also going to be a study done on the adverse effects on the dark sky at night?	Julie Abo	Yes, there is a dark night sky study underway. Those results will be available with the Draft EIS.	
Who will be responsible for maintenance of roads? Will the developers be responsible for returning the public roads used during construction to their original condition?	Linda Montgomery		
How many participants are there currently?	Julie Abo	There are currently 62 attendees.	
2.3MW 101m rotor diameter	Eli Bowles		
The amount of energy that will be produced (1000MW)-what percentage of time do the blades need to be spinning to produce that amount of energy? It is windy in Idaho but it isn't windy 24/7.	Joan Hurlock		

Question	Asker Name	Answer(s)	
so the turbrine will be within the vfd rule with the faa	Anonymous Attendee		
Luke, What are your feelings about downsizing as a condition of fruition. Please be somewhat specific.	Jerry Heimerdinger		
Thank you, Kate.	Julie Abo		
Question for Casey, due to the confusion with question vs comments. What issues would you professionally recommend to citizens concerned about Native and Japanese American?	Bif Brigman		
If part of the mission statement of the BLM is to manage "open spaces" for the public, how does the MVE project that crowds the open spaces with wind turbines fit into that?	Shauna Robinson		
What are the obligations of the BLM to the local residence? Is it an approval/rejection rate that will influence the decision?	rodeo247		
When the scoping period ends, legally, does that mean comments that are submitted after that time are not included in the public record?	Julie Abo		

Attendees

Adrienne Woods
Alice Hikido
Amy Schutte
Amy Tanaka/Trotter
Anna Tamura
Barbara Takei
Bif Brigman
Bob Unnasch
Brenda Mitchell
Brian Ahrens
Brian Rambur
Bryana Cockbain
Carl Montgomery
Christopher Cody
Creg & Debbie Clark
Dainee Gibson-Webb
David Hirai
Dirk Mendive
Ed Tanaka
Elden Christensen
Eli Bowles
Elizabeth Merritt
Emily Hanako Momohara
Emily Her
Frank Edelmann
Garret Visser
Gary Meeks
Gordon Sakaue

Greg Kitajima
Hannah Ashton
Holly Sandbo
Jack Harris
James Arima
Janice Prestwich
Jennifer Rideout
Jerry Heimerdinger
Jill Grams
Joan Hurlock
Jon Ochi
Julia Oxarango-Ingram
Julianne Abe
Julie Abo
Karen Rajala
Kenneth Pidjeon
Lara Miller
Lauren Waude
Lena Lee
Linda Montgomery
Lisa Shiosaki Olsen
Louis Zamora
Lynn Fuchigami Parks
Marie Kellner
Marleen Wallingford
Marsha Edwards
Mary Abo
Merilee Tanbara

Mia Russell
Mika Rothman
Nick Westendorf
Pat Warashina
Paul Tomita
Paula Fujiwara
Rachel Cohen
Rebecca Wood
Robert Hirai
Robyn Achilles
Rodeo247
Ron James
Roy Hubert
Russ Isaak
Ryan Nielsen
Sharon Carrell
Shauna Robinson
Susan Vineyard
Teresa Tamura
Theogene Mbabaliye
Thomas Koto
Tricia Waters
Tyson Carpenter
Wade Vagias
Wayne Frasure
Zack Orr

Other Attended: 4 participants joined by phone, name not recorded

APPENDIX D

Public Scoping Comments

Table D-1. Public Comments

Commenter	Comment Code	Comment Text
Individual	AIR01 - 1 - General	6.We have been informed that wind farms reduce precipitation and raise ground temperatures in the immediate area of the project. We need these questions answered.
National Park Service	AIR01 - 1 - General	Air quality is an important component of the overall NPS visitor experience. Craters of the Moon NM&P is located in one of the countries cleanest air regions and is a Congressionally designated Class 1 park under the Clean Air Act. The park considers clean air a fundamental resource and value making it an attribute essential to achieving the purpose of the park and maintaining its significance. Clean air enhances the color and contrast of landscape features, allows visitors to see great distances (well over 100 miles on a clear day), provides panoramic views of the naturally dark night skies, and safeguards ecosystem, visitor, and staff health (Craters of the Moon National Monument and Preserve Foundation Document).Concern: The NPS is concerned that the construction of over 400 infrastructure foundations and over 381 miles of new roads for this Project could generate emissions from construction traffic and heavy construction equipment, and dust from rock blasting and soil disturbance. Currently, the overall air quality at Craters of the Moon NM&P is in fair condition based on available data (visibility, ozone for human health, ozone for vegetation health, nitrogen deposition, sulfur deposition, and particulate matter); however, the overall air quality trend is deteriorating (NPS Park Conditions & Trends). The predominant wind direction to the park is from the southwest (https://www.nps.gov/crmo/faqs.htm). Emissions from trucks and airborne dust may travel from the project area to Craters of the Moon NM&P, further deteriorating visibility and other air quality related values. Recommendations: The NPS recommends that the BLM coordinate closely with the air quality management district and the National Park Service on cumulative emissions, visual impacts, and monitoring and mitigation opportunities, given the proximity of Craters of the Moon, a Class I air quality park. Additionally: Consider the erodibility of the 40 soil types found in the Project area and avoid the more erodible soil types within the half-mile wide corridor where infrastructure is planned. Include a table summarizing future annual cumulative emissions, broken out by year, for the project and surrounding agricultural operations. Compare these cumulative emissions to both de minimis thresholds and daily emission thresholds. Require the use of Tier 3, Tier 4, or higher engines for all construction equipment. Conduct a survey to confirm the availability of Tier 4 engines for project construction to support the emissions estimates. Require the installation of real-time PM10 dust monitoring equipment to continually monitor during both the construction and operational phases of the project. Creating a network of real- time monitors would provide the data necessary to inform mitigation and adaptation measures as construction progresses. Consider adopting a mitigation measure to limit on-site idling of off-road equipment. A similar mitigation measure was recently adopted by the BLM for the Crimson Solar Project (Air Quality Mitigation Measure 3) in the Record of Decision.
U.S. Environmental Protection Agency	AIR01 - 1 - General	Because the proposed action may result in air quality impacts, EPA recommends that the DEIS for the project include the following information: A detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS) and criteria pollutant non-attainment areas in the analysis area and vicinity, if applicable; Estimated emissions of criteria pollutants for the analysis area and discuss the timeframe for release of these emissions from construction through the lifespan of the proposed project. For estimation of emissions, it would be helpful to specify all emission sources and quantify related emissions; A description of how BLM will ensure that the proposed alternatives comply with federal conformity requirements. Demonstrate conformity for all pollutants for which relevant air basins are in nonattainment or maintenance status, and whose construction or operational emissions could exceed the applicable de minimis levels; About pollutants from mobile sources, stationary sources, and ground disturbance; A Construction Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and oxides of nitrogen (NOx); Potential effects from air pollutants- including air toxics- to workers, ground crews, nearby residents, businesses, and any sensitive receptor locations, such as, schools, medical facilities, senior centers and residences, daycare centers, outdoor recreation areas (e.g., parks); and Mitigation measures to minimize the proposed project impacts to air quality.
Idaho Conservation League	AIR01 - 1 - General	Project construction will involve the use of mobile concrete batch plants, large amounts of vehicle emissions and dust generation, among other activities that may impact air quality. We appreciate the Dust and Emissions Control Plan included in the Plan of Development and look forward to further refinements as informed by the NEPA process. The DEIS needs to disclose the anticipated air quality impacts and develop additional design features as needed to ensure that air quality is protected.
National Park Service	AIR02 - 2 - Fugitive Dust	Consult with the NPS on the Dust and Emissions Control Plan to protect park air quality and air quality related values. Describe how adaptive management would be used to manage fugitive dust control within the project area. Identify the criteria that would be used to evaluate the effectiveness of fugitive dust control measures
Individual	AIR03 - 3 - Climate Change/GHG	Thank you for the opportunity to submit comments on the Lava Ridge Wind project. I would recommend that in evaluating this project, you should keep in mind the climate benefits of the additional renewable energy that this project will produce. Although reasonable efforts should be made in the design of the project to mitigate the impacts on birds and other wildlife, they should not be a reason to deny permission to build the project. The slight impacts to wildlife in the immediate vicinity of the project are mitigated by the larger positive impacts of increasing the production of renewable energy. Wildlife in the area are already impacted by worsening extremes in temperature, changes in precipitation and climate driven wildfires both in the local area and from smoke travelling hundreds of miles. Without projects like this one, these impacts will only worsen.
Individual	AIR03 - 3 - Climate Change/GHG	I would like to express my support for the Lava Ridge Wind project, as an Idaho resident and as an ecologist. It is my understanding that many other Idaho residents of the magic valley are opposed to this project, these are based on either unfounded fears of exaggerated environmental concerns or purely selfish reasons. Currently, 76% of the electricity generated in Idaho at utility-scale power plants was produced from renewable energy sources. That is something every Idaho resident should be proud of, but in order to mitigate the impacts of climate change, which are already devastating our lands through drought, we must push towards 100%, as should every state in the union. This wind project will undoubtedly have a localized negative impact on the environment, this is a necessary cost to reduce the use of fossil fuels and avoid worse environmental impacts. The most notable environmental fear amongst opponents of wind power is the impact on birds. Loss of habitat due to drought which is made worse by climate change will have a much strong impact on bird populations than wind farms. We must also acknowledge that all forms of power generation have some environmental impact. The communities living in proximity to coal and natural gas generators are suffering from the pollution caused by those power sources. For magic valley residents to say they must shoulder that burden so that we don't have to look at turbines on our horizon is absolutely ridiculous.
Individual	AIR03 - 3 - Climate Change/GHG	When do these large windmill farms begin to affect our weather patterns. First they will take large amounts energy from the wind and second they will cause turbulences that will change the layers of wind above them and mix the temperatures within these layers.
U.S. Environmental Protection Agency	AIR03 - 3 - Climate Change/GHG	In characterizing the affected environment and environmental consequences of the proposed action, EPA recommends that the DEIS for the proposed project: Include existing and reasonably foreseeable environmental trends related to a changing climate; Discuss reasonably foreseeable effects that a currently changing climate will have on the proposed project and the project area, including its infrastructure. This could help inform the development of measures to improve the climate resilience of the proposed project. If projected climate-related changes could notably stress the affected environment or exacerbate the environmental impacts of the project, these impacts should also be considered as part of the NEPA analysis. For example, adaptation strategies could include an extreme weather event analysis to minimize or prevent a disruption of power or loss of energy to consumers from natural disaster events. An increase in the magnitude or frequency of extreme events can severely challenge utility systems that are not designed to withstand intense events. Extreme event analyses or modeling can help develop a better understanding of the risks and consequences associated with these types of events; Estimate the direct and indirect greenhouse gas emissions that will result from proposed construction, operations, and decommissioning activities. Estimated emissions can serve as a useful proxy for assessing relative effects, comparing alternatives and supporting the need for practicable mitigation to reduce greenhouse gas emissions; Indicate expected sulfur hexafluoride (SF6) emissions usually associated with gas-insulated switchgears on the WTGs and measures to be taken to minimize these emissions. One action that could be taken is for BLM to require adoption of SF6-free switchgears (clean-air) or other equipment. If SF6-free switchgears are determined to be technically infeasible, or are unavailable, the Applicant could also limit SF6 leaks to the extent practicable or required by state or federal regulations. SF6 is the most potent known greenhouse gas, with the potential to trap infrared radiation approximately 23,000 times more effectively than carbon dioxide. SF6 is also a very stable chemical, with an atmospheric lifetime of 3,200 years. Thus, a relatively small amount of SF6 can have a significant impact on global climate change; and Highlight the climate change benefits/avoided greenhouse gas emissions. Concerning climate resilience and adaptation, EPA encourages BLM describe available mechanisms in its licenses and other authorizations to cover the costs of safety measures and project operations and decommissioning including specific adaptive management plans to contend with changing climatic conditions that may affect operations.
Idaho Conservation League	AIR03 - 3 - Climate Change/GHG	The Council for Environmental Quality is in the process of revising the NEPA regulations so that federal agencies must analyze the climate effects of projects on federal land. While this revision process has not been finalized, we recommend that the BLM include a climate assessment as part of this project.
Star Lake Grazing Permittees	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	However, with that said, we do know enough that a No Action Alternative should be assessed due to the apparent lack of wind potential within the Star Lake Allotment according to the U.S. Department of the Interior itself. If little or no wind potential exists, it seems the project is doomed at the outset.
Individual	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	I am experiencing difficulty coming up with reasonable alternatives to MVE's proposal. Drastically reducing the magnitude of the project's size would be an idea. Fifty to one hundred turbines? If the project were approved with modifications, it could be a model for future projects elsewhere. Substantially scaled down, extremely high and enforced rehabilitation of the ravaged ecosystem, and stringent and forceful decommissioning of any kind would make these types of projects more feasible.

Commenter	Comment Code	Comment Text
Individual	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	It is my conclusion that the Lava Ridge Wind Project would have a severe negative impact upon all aspects of this sagebrush steppe ecosystem. Based upon my research and the well-being of this environment I feel the project should not be approved. Or, to a lesser extent, approved with the modification that the magnitude of the project be substantially reduced.
Individual	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	Please study all reasonable alternatives in an EIS, including the alternative of distributed energy generation including rooftop solar. The Bureau must consider all reasonable alternatives even if they are outside the jurisdiction of the agency.
Idaho Recreation Council	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	Please develop a complete range of alternatives. It would be easy to simply close the area where the turbines are located to all other uses. The BLM can prove that multiple use is more than just a phrase, it is a viable management option. I strongly encourage BLM to find a balance. This project should not lead to closures for other types of uses.
Idaho Falls Japanese American Citizens League	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	As you develop the EIS, I encourage the BLM to work with the National Park Service to ensure that all alternatives in the Draft Environmental Impact Statement preserve Minidoka's fundamental resources and values (FRV) unimpaired for the benefit of future generations. Specifically, I request that all of the alternatives preserve Minidoka's remote environmental setting, as provided in the Parks Foundation Document: Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.
Individual	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	In addition, alternatives that minimize and alternatives that eliminate the potential visual and cultural impacts to the Minidoka National Historic Site must be analyzed in the EIS. Such alternatives should include relocation of proposed wind turbines, power lines, roads, and other facilities to achieve these reductions of impacts.
Friends of Minidoka	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	In developing future action alternatives for consideration in the NEPA process, we request that all action alternatives preserve Minidoka's fundamental resources and values unimpaired. We request that the Draft EIS includes a preferred alternative to help focus public comment.
U.S. Environmental Protection Agency	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	EPA recommends that the DEIS include a reasonable range of alternatives that meet the stated purpose and need for the project which are responsive to the issues identified during the scoping process. A reasonable range of alternatives will include options for avoiding environmental impacts, while the alternatives analysis will describe the approach used to identify environmentally sensitive areas and the process used to designate them in terms of sensitivity. The DEIS will also need to clearly describe the rationale used to determine whether impacts of an alternative are significant or not. Reasonable alternatives could include, and are not necessarily limited to: alternative locations, configurations, and types (size, height, and power) of wind turbine generators (WTGs), alternative transmission options, as well as alternative storage technologies. The CEQ regulations for implementing NEPA state that agencies shall include appropriate mitigation measures not already included in the proposed action or alternatives (40 CFR 1502.14(f)). The DEIS will also need to include a discussion of the reasons for the elimination of other alternatives considered and not evaluated in detail. Lastly, identify the preferred alternative in the DEIS, if known.
Idaho Conservation League	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	Based on these issues, the BLM and Magic Valley Energy/LS Power should develop a wide range of alternatives that meaningfully avoid, minimize and mitigate negative effects. Such alternatives could seek to reduce visual effects by dropping turbine strings within a certain distance of Minidoka National Historic Site and lowering the hub height of the next set of towers, among other measures. We recommend working with stakeholders to see how they respond to different alternatives designed to address the issues of concern.
Idaho Conservation League	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	Analyzing a reasonable range of alternatives is the heart of the NEPA process. Developing this range begins with an appropriately drafted purpose and need statement. As we explained above, the BLM should consider the purpose and need for the Lava Ridge project to include a range of alternative renewable energy technologies and project designs. The Plan of Development describes that the project could include a larger number of smaller individual turbines or a smaller number of larger turbines. The BLM should examine both alternatives as well as other renewable technologies that would produce similar amounts of energy for similar costs. Ultimately, the BLM may select a combination from different alternatives, providing that the NEPA analysis sufficiently covers the impacts.
Idaho Conservation League	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	We strongly encourage the BLM and Magic Valley Energy/LS Power to closely review the scoping comments from potentially affected communities and have additional meetings with stakeholders to better understand critical issues and potential solutions. We hope the BLM and Magic Valley Energy/LS Power will develop a wide range of alternatives in response to these issues and that meaningfully avoid, minimize and mitigate negative effects. Such alternatives should seek to reduce visual effects by dropping turbine strings within a certain distance of Minidoka National Historic Site, lowering the hub height of the next set of towers, or avoiding visual impacts entirely by switching to solar panels where appropriate.
Coalition to Protect America's National Parks	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	<p>Comment # 3: Project siting concern: In the interest of transparency, the DEIS should include a summary of communications between BLM and Magic Valley Energy regarding possible locations for this project; and an explanation of the factors considered or not considered in determining the proposed project site (i.e., location).</p> <p>As background, the U.S. Department of Energy (DOE) Wind Energy Technologies Office states that [a]reas with annual average wind speeds around 6.5 meters per second and greater at 80-m height are generally considered to have a resource suitable for wind development.²³ However, the National Renewable Energy Laboratory (NREL) wind resource map for Idaho (below) indicates that the average wind speed in the vicinity of the Lava Ridge project site just north of Twin Falls is less than the recommended 6.5 meters per second threshold.</p> <p>This begs the question why was the project proposed at this location, if the wind energy potential is marginal at best? What other factors were considered, if any?</p> <p>We understand that MVE may have approached BLM previously (i.e., some years ago) about locating the project south (not north) of Twin Falls. We also understand that MVE was possibly discouraged from applying for a grant to use that location for a wind energy project due to conflicts with greater sage grouse habitat. As a result, MVE proposed the current project site immediately north of Minidoka NHS.</p> <p>Is this true? And if so, to what extent did BLM suggest or encourage MVE to consider the current proposed site? When considering the current proposed site, to what extent did MVE or BLM consider the projects obvious, significant, unavoidable, and unmitigable adverse impacts to resources and values at Minidoka NHS, a unit of the National Park System? And why did BLM not suggest or discourage MVE from applying for this site because of the direct conflicts with the conservation of Minidoka's resources and values?</p> <p>These questions and concerns relate directly to the previously mentioned executive orders on environmental justice and Secretary Order 3399 on Restoring Transparency and Integrity to the Decision- Making Process. To be frank, because of the marginal wind energy potential and the enormity of the potential impacts to Minidoka NHS, proceeding with an EIS to develop a massive wind farm at this particular site defies common sense. BLM must explain in the DEIS how the site selection decision for the proposed action was reached and is being allowed to move forward for detailed analysis. The explanation must be much more in depth than BLMs typical response of simply saying this is the site MVE has applied for, so it must be considered.</p> <p>In addition to including a summary of communications between MVE and BLM that contributed to the selection of the proposed project site, we ask that the DEIS identify the factors that were considered or dismissed during site selection discussions. This information could be simply summarized in a table in the DEIS that identifies the factor and a check mark identifying whether the factor was considered or not in the siting decision. For example, these factors could or should include:</p> <p>Avoidance of significant conflicts with greater sage grouse habitat;</p> <p>Avoidance of significant conflicts with the conservation of resources and values at Minidoka NHS;</p> <p>Proximity to the future completion of the Southwest Intertie Project (SWIP), an interstate high voltage transmission line project approved in 1994 that is, as yet, not constructed in Idaho;</p> <p>Adequacy of available wind resources that would meet or exceed DOE's recommended 6.5 meters per second at 80 meters threshold;</p> <p>Consistency with applicable BLM land use plans, including the Monument Resource Management Plan (RMP) and related documents; and</p> <p>Any other factors considered or dismissed by BLM.</p>
Coalition to Protect America's National Parks	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	<p>Comment # 6: The DEIS should fully consider a range of reasonable alternatives to the proposed action, as required under sections 102(2)(C)(iii) and 102(2)(E) of NEPA.</p> <p>Reasonable alternatives means a reasonable range of alternatives that are technically and economically feasible, meet the purpose and need for the proposed action, and, where applicable, meet the goals of the applicant. See 40 CFR 1508.1(z). We offer the following suggestions related to reasonable alternatives:</p> <p>We suggest that BLM and/or MVE use geographic information system (GIS) mapping technology to identify potential project sites on BLM land that: 1) avoid major conflicts with greater sage grouse habitat; 2) are located in areas with average annual winds of 6.5 meters per second or greater at 80 meters; 3) are within an appropriate distance of the proposed but yet to be completed Idaho segment of SWIP; and 4) are located at least 30 miles from Minidoka NHS. Such sites, if found, should be considered prime wind farm locations to fully consider as action alternatives.</p> <p>In the event no such prime sites are found, we defer to BLMs judgment as to which two alternate sites would generally present the less environmentally damaging and sufficiently feasible locations to consider in addition to the proposed action. Obviously, BLM should explain its site selection methodology in the DEIS.</p> <p>The DEIS should identify BLMs preferred alternative, as required under 40 CFR 1502.14(d); and, in the interest of transparency, the DEIS should also identify the environmentally preferable alternative.</p> <p>While it may be reasonable to consider variations of the proposed action (such as different combinations of mitigation measures proposed at the same site), these variations should be presented as alternative elements under the proposed action, rather than as distinctly different alternatives.</p>

Commenter	Comment Code	Comment Text
		<p>In practical terms, there should be at least two action alternatives considered that would be located distinctly outside of (i.e., away from) the project area for the proposed action. In practical terms, distinctly outside as used here means located at least 30 miles from Minidoka NHS so as to generally avoid adverse visual impacts to Minidoka.</p> <p>The descriptions of each action alternative, including the proposed action, should include a Class 4 construction cost estimate. We suspect that at some point MVE and/or BLM will use cost differences between action alternatives as justification, in part, for selecting the proposed action, so having a baseline cost estimate for each is essential for comparison purposes.</p> <p>While it is premature to discuss compensatory mitigation for the proposed action under Section 106 of the NHPA, based on other federal projects that have resulted in significant visual impacts to units of the National Park System and/or National Register properties, compensatory mitigation for the Lava Ridge Wind Project at the proposed location could conceivably run into hundreds of millions of dollars. In our view, it would be better project management if BLM were to choose a far less damaging location for the wind farm in the first place, even if construction costs were relatively higher than for the proposed action. For example, if a reasonable alternative located 30+ miles away from Minidoka NHS were to cost \$40, \$50, or even \$75 million or more to construct than the proposed action, it would still be a more cost effective alternative since it would avoid significant adverse effects to Minidoka NHS and the need for costly compensatory mitigation, and possibly litigation.</p>
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	ALT01 - 1 - General Deficiency, Inadequate Range of Alts	<p>Conversations with BLM staff indicate the project will consider sage-grouse lek avoidance buffers (3.1-mile buffer from each active lek) established by the 2015 Greater Sage Grouse Approved Resource Management Plan Amendment. We encourage the BLM to develop and analyze alternatives with lek buffers ranging from of a minimum of 3.1 miles up to 5 miles from active leks to fully understand what is most effective to minimize disturbances across the landscape. Given the scale of the proposed project and the unknowns around long-term impacts of wind development on the species, we believe developing these alternatives is a careful and considerate approach.</p> <p>There have been several significant policy changes and/or reinstatement of previous policies that apply to the BLM projects since the release of the scoping document and open public comment period. Our organizations expect the BLM to integrate these policy changes into Lava Ridges NEPA process and develop alternatives that reflect these changes. Specifically, we look to the BLM to follow mitigation guidance set by Instruction Memorandum (IM) No. 2021-046 Reinstating the Bureau of Land Management (BLM) Manual Section (MS-1794) and Handbook (H-1794-1) on Mitigation. The IM provides policies to:</p> <p>1)Implement consistent principles and procedures for mitigation in the BLMs authorization of public land uses;</p> <p>2)Apply mitigation to address reasonably foreseeable impacts to resources (and their values, services, and/or functions) from public land uses; and</p> <p>3)Follow the mitigation hierarchy by first avoiding damage to the public lands and resources; second, minimizing damage that cannot be avoided; and third, compensating for any residual impacts to important, scarce, or sensitive resources or resources protected by law.(Emphasis added)33</p> <p>The IM directs the BLM to implement mitigation through a landscape-scale approach, utilize best management practices, maintain durability for mitigation measures, monitor mitigation measures for compliance and effectiveness, and adaptively manage mitigation measures. We encourage the BLM and MVE to engage with IDFG and the public to identify areas within the project where damage to public lands and resources (more specifically, sage-grouse, big game habitat) can be avoided and/or minimized. If determined to be unavoidable, we expect the BLM provide ample justification and then to outline plans for compensation for these sensitive resources with durable conservation actions elsewhere.</p>
Individual	ALT02 - 2 - Suggested New Alternative	I believe the BLM design for the wind turbines should exclude the area surrounding the Minidoka historic camp where the Japanese Americans were incarcerated during WWII. This area needs to be preserved for visitors to see the sad part of history that should never occurred. The turbines should be placed far enough away from this site so that they will not interfere with the visitation to the area surrounding the camp buildings.
Individual	ALT02 - 2 - Suggested New Alternative	The wind farm should be moved to another location; it is not appropriate to be placing it next to Minidoka. It will cause too much harm to Minidoka visitors will not want to visit the site once they learn that whirling wind turbines will be next to the site.
Star Lake Grazing Permittees	ALT02 - 2 - Suggested New Alternative	we have concerns that the construction phase and the operation & maintenance phase will negate or diminish our ability to maintain our existing Active Use AUMs; given the projects significant on-the-ground zone of influence within the Star Lake Allotment. While we certainly don't want and we certainly don't welcome to be bought out (in whole or in part), we project that too could be an Alternative to assess within any NEPA document.
Star Lake Grazing Permittees	ALT02 - 2 - Suggested New Alternative	<p>(1)No apparent viability and feasibility relative to a Wind Project in Star Lake Allotment.</p> <p>The proposed project assumes the existence of wind to support a Wind Project, like that proposed by Magic Valley Energy. However, the wind potential to support a Wind Project upon the public lands within the Star Lake Allotment is non-existent in some parts and low in other parts, according to a Wind study by the U.S. Department of the Interior. This Wind study is reported in the Record of Decision dated December 15, 2005, for Implementation of a Wind Energy Development Project and Associated Land Use Plan Amendments issued by the U.S. Department of the Interior (2005 ROD-Wind) within it associated Final Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administrated Lands in Western United States in June 2005 (2005 FPEIS-Wind). The 2005 FPEIS-Wind identified the Wind Resource Potential within the area of the Star Lake Allotment, as well as adjacent areas, as follows:</p> <p>2005 FPEIS-Wind, Volume 2, Appendix B, at page B-60 (Map of Burley, Idaho; BLM Field Office; Wind Resource Potential, wherein the area encircled in fuchsia is the approximate location of the Star Lake Allotment). This Map illustrates, as noted, that the Wind Resource Potential within the area of the Star Lake Allotment is non-existence in some parts and low in other parts, but that areas beyond the boundary of the Star Lake Allotment to the southeast and to the southwest have Medium and High wind resource potential. See 2005 FPEIS-Wind, Volume 2, Appendix B, at page B-60.</p> <p>BLM favorably cited the 2005 ROD-Wind and the 2005 FPEIS-Wind as part of its final rule-making in issuing new regulations as to Leasing Public Lands for Solar and Wind Energy Development. See also 81 Fed.Reg. 92122, 92125 (12/19/2016). BLM stated during final rule- making:</p> <p>On June 24, 2005, the BLM published the Final Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States (Wind Programmatic EIS) (70 FR 36651), which analyzed the environmental impact of the development of wind energy projects on public lands in the West and identified approximately 20.6 million acres of public lands with wind energy development potential (http://windeis.anl.gov).</p> <p>Following the publication of the Wind Programmatic EIS, the BLM issued the ROD for Implementation of a Wind Energy Development Program and Associated Land Use Plan Amendments (Wind Programmatic EIS ROD) (71 FR 1768), which amended 48 BLM land use plans. The Wind Programmatic EIS ROD did not identify specific wind energy development leasing areas, but rather identified areas that have potential for the development of wind energy production facilities, along with areas excluded from consideration for wind energy facility development because of other resource values that are incompatible with that use. 81 Fed.Reg. 92125 (12/19/2016) (emphasis supplied).</p> <p>Based upon the 2005 ROD-Wind and 2005 FPEIS-Wind, particularly as recently cited / ratified by the U.S. Department of the Interior in 2016, it is apparent that the viability and feasibility of a Wind Project is not practicable in the Star Lake Allotment, but it likely would be practicable in other locations outside of the Star Lake Allotment, as illustrated in the Map above. See 2005 FPEIS-Wind, Volume 2, Appendix B, at page B-60. In fact, under information and belief, Magic Valley Energy has another proposal south of the Star Lake Allotment within or near the Berger Allotment, Burley Field Office, Twin Falls District, Idaho. BLM and Magic Valley Energy are urged to pursue a Wind Project in another location outside of the administrative boundary of the Star Lake Allotment. Should BLM and Magic Valley Energy desire to continue to pursue a Wind Project within the Star Lake Allotment, it is apparent any NEPA document should assess a No Action Alternative (given the lack of wind resource potential within the area of the Star Lake Allotment).</p>
Individual	ALT02 - 2 - Suggested New Alternative	I would ask that the BLM please consider that they at least relocate any construction that overlaps the original Minidoka War Relocation Center boundary to an area outside the boundary. Roads, transmission lines, turbines and other construction in this zone will be irreparable. Ideally, I would also ask that there be a buffer zone of one or more miles from the Minidoka War Relocation Center boundary to further protect this historic and cultural property and to help reduce visual pollution from the current Minidoka National Historic Center.
Individual	ALT02 - 2 - Suggested New Alternative	Please do not allow this project to be built in the visible proximity of the Minidoka Historic Site.
Individual	ALT02 - 2 - Suggested New Alternative	For these reasons we ask that the Lava Ridge Wind Project be rejected and moved to a location with lesser historical and personal impact.
Individual	ALT02 - 2 - Suggested New Alternative	Alternative - move the whole project 6-10 miles to the north to the Wild Horse Butte, Shale Butte, and, Black Ridge Butte area, located in Lincoln and Minidoka counties. There is a 500 kv transmission line in close proximity. A higher elevation and excellent isolation.
Individual	ALT02 - 2 - Suggested New Alternative	Please seriously consider relocating your project to another location that does not minimize the tremendous impact of such an important National Historic Site as Minidoka.
Individual	ALT02 - 2 - Suggested New Alternative	Please reconsider the proposed Lava Ridge Wind Project and find a different location for it that does not impact the Minidoka National Historic Site or sacred Native American land.
Twin Falls Historic Preservation Commission	ALT02 - 2 - Suggested New Alternative	<p>The National Environmental Policy Act requires the BLM to consider alternatives outside of their jurisdiction to project proposals such as Lava Ridges. Possible alternatives include,</p> <p>Distributed generation (DG) According to the Environmental Protection Agency, distributed generation refers to a variety of technologies that generate electricity at or near where it will be used. DG can provide for individual homes or businesses, or it can be set up as part of a microgrid, a smaller grid that is also tied into the larger electricity delivery system, like that from a military base or large industrial complex. Residences can generate power using rooftop solar panels, small wind turbines, and back-up generators. Large businesses, industries, etc. may opt for combined energy generation from solar, wind, hydropower, solid waste incineration, and back-up generators for emergencies. According to a report in Energy.gov, Los Angeles alone has the rooftop potential for 9,000 MW of solar.</p> <p>DG has been successfully implemented in European nations like Spain and Germany and is now becoming more accepted in the United States as a more cost-effective means of using renewable technologies. A big plus is energy does not have to be exported from a remote source, i.e., Idaho sending power to California, and there would be no need for Idaho to lose its open spaces to the construction of a massive wind farm. Too, local control over power generation may be much better than relying on an energy project hundreds of miles away. DG would certainly eliminate the impacts on the viewsheds, cultural and natural resources, and desert environment that a remote project like Lava Ridge would bring.</p>

Commenter	Comment Code	Comment Text
		Also, Lava Ridge has a thirty-year lease for its wind farm. As quickly as the wind energy technologies change and improve, it seems it would be easier for local centers to modify wind turbines than it would be for Lava Ridge with its 400 mammoth turbines.
Twin Falls Historic Preservation Commission	ALT02 - 2 - Suggested New Alternative	Use of previously disturbed lands - Properties such as brownfields and degraded lands may be better locations for projects like Ridge. Utilizing lands where the environment and resources have been previously disturbed, would be far better than choosing a site where a wind farm would impact historic sites, geologic formations, open spaces, cultural resources, wildlife, sensitive bird and raptor species, recreation, grazing, and local communities. Siting energy projects on such lands only makes sense.
Individual	ALT02 - 2 - Suggested New Alternative	Please consider the visual impact the Lava Ridge project would have to visitors of MNHS. I urge the powers that be to redirect this portion of the proposed project out of visual range of MNHS.
Individual	ALT02 - 2 - Suggested New Alternative	The Lava Ridge Wind Project, a worthy endeavor, needs to find another site. Minidoka is on federal lands in the care of the National Park Service. It has been entrusted with preserving a uniquely meaningful historical site and protecting it from irreparable damage.
Individual	ALT02 - 2 - Suggested New Alternative	Please review other sites, perhaps some distance to the north where the towers could not be seen from the MNHS.
Individual	ALT02 - 2 - Suggested New Alternative	Please consider alternatives to this large project such as rooftop solar and conservation of energy.
Individual	ALT02 - 2 - Suggested New Alternative	Without some consideration for the history of this location, how can either the National Park Service or the National Historic Sites be able to fulfill their mission? 1. A very large buffer zone must be required for proximity to National Park Service lands. For Minidoka this zone must remove the light and sound pollution and minimize the vertical view pollution.
Idaho Falls Japanese American Citizens League	ALT02 - 2 - Suggested New Alternative	I ask that you, please, reconsider the location of this project. I realize that there is a need for renewable energy, but the placement of this project conflicts with the Congressional mandates of the National Parks to preserve the heritage of this sacred site. If you would not place four hundred giant wind turbines next to other National Parks and nationally-significant historic sites like Mount Vernon, then please, do not place it next to our historic site of healing.
Individual	ALT02 - 2 - Suggested New Alternative	Please consider this appeal to revisit the planning of LS Power's proposal as it stands - please choose another, better fitting location that does not dishonor our history and cause more pain to our Japanese siblings.
Individual	ALT02 - 2 - Suggested New Alternative	I recognize the importance of environmental stewardship and Americas role to develop renewable energies, but the Lava Ridge project needs to be located completely away so that it will not impact the Minidoka NHS and adjacent areas. Simply downsizing the project or lowering the tower height or reducing the supporting infrastructure is not a satisfactory option, if the proposed location near Minidoka NHS is still maintained.
Individual	ALT02 - 2 - Suggested New Alternative	As important as renewable energy is to our future, it is not necessary to destroy our past. Please consider working to site this project in a location that does not significantly degrade the Minidoka Historic Site.
Friends of Minidoka	ALT02 - 2 - Suggested New Alternative	BLM manages 12 million acres of public land in Idaho and 48 million acres in Nevada. We are hopeful that BLM will be able to identify other sites in Idaho and in Nevada with fewer resource conflicts with stakeholders.
Friends of Minidoka	ALT02 - 2 - Suggested New Alternative	To reduce the visual impacts of the project, please consider replacing the wind turbines with vortex bladeless and other wind power technologies which would have less visual and other impacts on the park and nearby resources.
National Parks Conservation Association	ALT02 - 2 - Suggested New Alternative	A robust range of alternatives is critical to facilitate informed decision-making and public input, and to afford BLM flexibility in ultimately adopting final decisions. BLM should at a minimum develop alternatives that do not allow development within the viewshed of Minidoka National Historic Site and Craters of the Moon National Monument and Preserve. It is well within BLMs authority to make decisions regarding land use authorizations that protect National Park System units and resources. 1 Development adjacent to NPS units can result in significant impacts to park resources and values, as well as the ability for current and future visitors to experience parks unimpaired, as intended by the 1916 National Park Service Organic Act.
Individual	ALT02 - 2 - Suggested New Alternative	If the Californians want wind energy, they should put this wind farm (and all their future expansions) in California in the Mohave Desert or closer to catch the Santa Anna winds.
Tule Lake Committee	ALT02 - 2 - Suggested New Alternative	We ask the Bureau of Land Management to seek alternatives that honor, rather than desecrate this American civil rights site. The Bureau of Land Management must protect this national asset, not collaborate in its destruction. Please either deny the wind project or ensure that it will be relocated outside of Minidoka's viewshed and will have zero impacts on this National Historic Site.
Idaho Conservation League	ALT02 - 2 - Suggested New Alternative	The Plan of Development proposes a two year development period and two year construction time frame. This phased approach enables an alternative that allows for development in areas with the lowest conflicts while continuing to optimize options in other areas. This approach could defer the front-country development in a larger swath around Minidoka National Historic Site for a number of years. During this time Magic Valley Energy/LS Power and BLM can conduct an ongoing assessment of the rapidly changing market conditions and technological improvements happening in the industry to shape future project phases. A significant update to the Plan of Development could require a separate NEPA process. However, by creating a sufficiently broad purpose and need and range of alternatives at this stage the BLM can enable future proposals to tier from this analysis.
Individual	ALT02 - 2 - Suggested New Alternative	In my view, this project is defacing and destroying an historic landscape that is central to the story of the Asian American experience in the United States. From what I have read about the projects scope, the construction of these wind towers will destroy valuable archaeological resources both extant on the landscape and below the ground. I would encourage you to reconsider this project and find another location far away from the few World War II incarceration sites that remain on public lands and open to visitors, survivors, and descendant communities.
Individual	ALT02 - 2 - Suggested New Alternative	This land has been designated by our government "to protect the legacy of incarceration history and its important lessons in civil liberties." It presently stands as an opportunity for future generations of students to learn about the incarceration experience of the 13,000 persons of Japanese ancestry during World War II. I fully support clean energy, but I strongly urge the Bureau of Land Management to find another site among many open spaces in the country for this project.
National Trust for Historic Preservation	ALT02 - 2 - Suggested New Alternative	The project as proposed would result in the construction of hundreds of wind turbines as tall as 740 feet high within the viewshed of the Minidoka National Historic Site. Multiple turbines are proposed to be constructed within the original internment camp allotment. In addition to the massive turbines themselves, which would cover 73,000 acres of BLM land, the proposed project includes seven new substations, a battery energy storage system, three operations and maintenance facilities, as well as new access roads, and new transmission lines to connect the generated power to the electric grid. The National Trust asserts that these actions would adversely impact Minidoka National Historic Site. To minimize or avoid these effects, we request that the BLM consider the following two alternatives in the DEIS: Reduced Scale Alternative The scale of the proposed project is so massive that a reduced number of turbines must be considered as an alternative. The stated goal of this project is to construct and operate a commercial-scale wind energy facility that reliably and economically produces wind energy for delivery to power markets in the western United States.1 An analysis of whether that goal can be achieved with a smaller project scale that avoids and minimizes impacts to Minidoka National Historic Site must be included in the Draft EIS. This alternative is notably not included in the Preliminary Proposed Action and Alternatives section of the NOI. Relocation Of Turbines Away From the Minidoka National Historic Site The Preliminary Proposed Action and Alternatives section of the NOI identifies changes to facility layouts as an alternative to be considered.2 The BLM has additionally made available to the National Trust maps that identify alternative sites for turbines in locations further away from the Minidoka National Historic Site than those currently proposed for use. The BLM must include one or more alternative(s) in the DEIS that locates all turbines as far away from Minidoka National Historic Site as possible, using every feasible alternative location to do so. The National Trust specifically requests that this alternative include the relocation of all turbines proposed for construction within the original internment camp allotment.
Japanese American Confinement Sites Consortium	ALT02 - 2 - Suggested New Alternative	We strongly believe that racial justice and renewable energy can co-exist and urge BLM to work with the National Park Service to develop alternatives that don't impair Minidoka's values. JACSC requests that LS Power identify alternative project sites which will not impact the Japanese American community to ensure that Minidoka will continue to serve as an unimpaired place of healing, learning and strength. Alternative sites must be fully considered so that the site and surroundings that the NPS is mandated to protect are not disturbed.
Individual	ALT02 - 2 - Suggested New Alternative	Accordingly, please have the subject colossally large wind turbine energy project relocated a major substantial out-of-view distance away from the Minidoka NHS. Given the apparent vast and wide expanse of Southern Idaho, there should be many other alternative sites that would be much more appropriate. While I'm all for clean renewable electricity to replace fossil fuel power, they should not be sited at the huge detriment of peoples of color including we Americans of Japanese descent.
Shoshone-Bannock Tribes	ALT02 - 2 - Suggested New Alternative	the Tribes would request that the proposal include alternatives for installing and operating micro grids for local communities, and objectively present the cost/benefit of local energy costs to the citizens of Southern Idaho from the proposed production of wind energy.
Individual	ALT02 - 2 - Suggested New Alternative	The Lava Ridge project must respect the Minidoka site. No turbine units should be placed in the historic footprint of the Minidoka site. This project must carefully consider the impact of the project on the Minidoka site and make adjustments. 400 turbine units on 73,000 acres is an enormous project. I feel that there is room for adjustment. Fewer units? Why not? Different locations of some units? Why not? The planned units within the historic footprint must be removed from the project. The project developer should be required to respect the history of the United State of America. The plan as it exists now does not do that.

Commenter	Comment Code	Comment Text
Individual	ALT03 - 3 - Suggested Modification to Existing Alternative	I suggest that if the proposed Lava Ridge Wind Project is no longer considered economically viable, or for any other reason it is not in use, then after a reasonable period it will be decommissioned and the towers removed (base pads may remain). I'd suggest that 10 years of use at less than 10% of planned annual output should trigger removal. Costs for removal of the towers should be secured with a bond paid by the Magic Valley Energy company.
National Parks Conservation Association	ALT03 - 3 - Suggested Modification to Existing Alternative	BLM must also develop alternatives that are consistent with the mitigation hierarchy. BLM is subject to a broad range of authorities supporting mitigation measures to minimize and offset unavoidable impacts. FLPMA requires BLM to manage for multiple use and sustained yield, and to avoid unnecessary or undue degradation of resources and values. ² NEPA and associated Council on Environmental Quality (CEQ) regulations require BLM to analyze potential impacts and consider ways to avoid, minimize and mitigate impacts in accordance with the mitigation hierarchy. ³ The mitigation hierarchy aims to minimize environmental harms associated with agency actions. First and foremost, BLM must seek to avoid impacts; then minimize impacts (e.g., through project modifications, permit conditions, interim and final reclamation, etc.); and, generally, only if those approaches are insufficient to fully mitigate the impacts, will BLM seek to require compensation for some or all of the remaining impacts (i.e., residual effects). BLM must apply the mitigation hierarchy to evaluation of the proposed project.
U.S. Environmental Protection Agency	ALT03 - 3 - Suggested Modification to Existing Alternative	Wind energy and related power transmission infrastructure projects commonly result in mortality of birds and bats due to collisions with rotor blades. Therefore, EPA recommends that the DEIS for this project: Locate wind turbine generators in areas that, if possible, avoid: <ul style="list-style-type: none">o Areas supporting a high density of wintering or migratory birds;o Areas with a high level of raptor activity;o Populations of less abundant species which may be sensitive to increased mortality due to collision. Also consider reducing perching and nesting opportunities;
Individual	ALT03 - 3 - Suggested Modification to Existing Alternative	If the study finds that this project must indeed go forward, I feel that Friends of Minidoka and the Minidoka Pilgrimage organizations should receive ongoing compensation to further their mission and educate generations to come.
Idaho Conservation League	ALT03 - 3 - Suggested Modification to Existing Alternative	In terms of mitigating visual impacts, on a visit to the Minidoka National Historic Site we noted that there is an existing transmission line in the direct line of sight just north of the Site. This transmission line was presumably constructed after the internment camp closed but before the official designation of the site as a National Historic Site. The transmission line presents a notable incongruence from the surrounding landscape. It may be worth exploring the feasibility of relocating or burying a portion of this transmission line as part of mitigation efforts for the Lava Ridge project. Depending on the alternative selected, there may be some improvements to visitor experiences if the transmission line is removed from the viewshed. The BLM and Magic Valley Energy/LS Power should discuss this and other potential alternatives with the National Park Service and members of the Japanese American community and see if such a proposal is of interest to them. This discussion could lead to other creative and innovative mitigation opportunities as well.
Project Mutual Telephone	ATTN02 - 2 - Notice of Appeal or Litigation	The FCC has issues certain penalties for broadband carriers such as PMT for not meeting ACAM (Alternate Connect American Model) mandates and requirements. Should LS Power Development be issues permits for this proposed wind farm and wireless interference is confirmed, PMT would be forced to file a formal complaint with the FCC.
Individual	ATTN02 - 2 - Notice of Appeal or Litigation	In short, should BLM ignore the irreparable and unmitigable adverse effects of Lava Ridge on Minidoka and make a callous decision to issue the necessary windfarm permits, I will have legal standing to challenge those permits and will happily become a plaintiff to protect Minidoka from harm.
Individual	ATTN02 - 2 - Notice of Appeal or Litigation	Per U.S. Department of the Interior Secretarial Order 3399, Section 5(c) [April 16, 2021], I formally request the NEPA process be suspended to fully comply with the requirement to engage potentially impacted environmental justice communities early in the project planning process. In particular, Section 5, Utilizing the NEPA Process to Restore Transparency and Integrity to the Decision-Making Process, is justification for this suspension to ensure a historically disenfranchised community be heard.
Friends of Minidoka	ATTN02 - 2 - Notice of Appeal or Litigation	On behalf of the Friends of Minidoka, I am writing to submit comments regarding LS Powers proposed Lava Ridge Wind Project and to ask that Bureau of Land Management suspend the development of a draft environmental impact statement and go back to square one to develop a revised proposal consistent with racial and environmental justice and our nations commitment to National Parks. LS Powers August 2021 proposal and BLMs process failed to follow Biden Administration policies to engage with environmental justice communities early in the planning process and runs counter to the Administrations goals for racial and environmental justice. By restarting the planning process and engaging with the Japanese American community from the beginning, the BLM will help the Administration achieve multiple goals relating to renewable energy, racial and environmental justice, and preserving our National Parks unimpaired for future generations.
Friends of Minidoka	ATTN02 - 2 - Notice of Appeal or Litigation	Because the location and size of the current proposal will dishonor the Japanese American community, the Friends of Minidoka will use every legal means to block the current proposal at every step in the process. Rather than smart from the start, this project is broken from the beginning.
Friends of Minidoka	ATTN02 - 2 - Notice of Appeal or Litigation	In order to ensure that the Administration achieves its goals, we ask that BLM take a "time out," suspend work on the draft environmental impact statement in order to reset the clock, and engage the Japanese American community early in the planning process, as required by S.O. 3399. Consistent with DOI process, we respectfully request BLMs consideration of our request to work with LS Power and stakeholders to go back to square one on the Lava Ridge site and develop a proposal for scoping that does not impair Minidoka's fundamental resources and values. Once BLM has engaged with the Japanese American community, BLM can go back out to the public with a revised proposal for scoping.
Individual	ATTN04 - 4 - Request to be Added to Mailing List	Please sign me up for Lava Ridge Project updates
Star Lake Grazing Permittees	ATTN04 - 4 - Request to be Added to Mailing List	Permittees request that they be put on the Interested Public list associated with this intended Project so they are informed of any and all meetings and opportunities to comment as to this intended Project.
SIRCOMM	ATTN04 - 4 - Request to be Added to Mailing List	We ask that you continue to keep us well informed of Project details as it develops.
BlueRibbon Coalition	ATTN04 - 4 - Request to be Added to Mailing List	BRC would like to be considered an interested public for this project.
Japanese American Exclusion Memorial Association	ATTN04 - 4 - Request to be Added to Mailing List	Please enter me in your "comment and information register,
Star Lake Grazing Permittees	ATTN05 - 5 - FOIA (Freedom of Information Act Request)	In addition, Permittees request a copy of the submitted application relating to Right-of-Way Serial No. IDI-39174, including all supporting information submitted by the applicant to BLM in support of such application, and including any meeting minutes / memos between BLM and Magic Valley Energy, LLC (Magic Valley Energy) related to the first meeting as required by 43 C.F.R. 2804.12(b)(4)(i) (10-1-2019 Edition). If this request requires a Freedom of Information Act request, please let us know, as well as the cost to process such FOIA request.
Star Lake Grazing Permittees	ATTN06 - 6 - Requires Agency Response	Based thereon, the Permittees request a copy of a map of the most recent active or occupied lek locations available from the Idaho Department of Fish Game for the area covering the Star Lake Allotment, including within 3.5 mile radius outside the boundary of the Star Lake Allotment. The Permittees need such a map to assess any buffers that could be implicated by the intended project. BLM will need the same information relative to any NEPA document.
Star Lake Grazing Permittees	ATTN06 - 6 - Requires Agency Response	We remind you of the several requests for information made within these comments. We reserve the right and opportunity to supplement our comments
Idaho Military Division	ATTN06 - 6 - Requires Agency Response	I need to submit a request for a microwave path study to be conducted and was wondering if there is an official form to do this, (I did not see one), and who I would send this to. We have state and federal microwave paths that carry network, public safety and emergency response traffic that pass through the proposed areas and need this to be factored in. I was wondering if I could get a map of the proposed corridors for the Lava Ridge Wind Project? We have several State and county microwave and radio paths in this area and I need to know which ones could be effected.
Individual	ATTN06 - 6 - Requires Agency Response	I have a question about the content of scoping comments. Can photos and videos pertinent to the project also be submitted? Can they be emailed to you at this email address?
Individual	ATTN06 - 6 - Requires Agency Response	I am helping the Friends of Minidoka with some mapping that will help them understand the proximity of the Lava Ridge project and they mentioned that you might be able to share the GIS coverages of the project. If that is correct, could I get copies of the following: * Turbines

Commenter	Comment Code	Comment Text
		* Access/Power Line Corridor * Turbine Corridor * 35kV Power Line * 230/500kV Line * Roads
Star Lake Grazing Permittees	ATTN07 - 7 - Request Meeting with Agency	Permittees request to meet and confer with BLM as to these comments, as well as throughout the intended process to assess this intended Project. Permittees request to coordinate directly with Magic Valley Energy, and the Permittees welcome an opportunity to meet and confer with Magic Valley Energy so Magic Valley Energy can more fully explain its proposal as directly related to the public lands within the Star Lake Allotment.
Star Lake Grazing Permittees	CUL01 - 1 - General Cultural Resources	In fact, recent cultural resource studies by BLM on the public lands in the Star Lake Allotment would appear to warrant significant consideration during any NEPA process.
Individual	CUL01 - 1 - General Cultural Resources	I will be providing public commentary as well, but am concerned about the proposed scope of the project and its potential impact on cultural resources.
Individual	CUL01 - 1 - General Cultural Resources	The project also proposes seven substations, over 200 miles of transmission lines, battery storage facilities, maintenance facilities, and 400+ miles of roads and crane walking paths. If built, it will be one of the largest in the U.S. Not only will many of the turbines be installed on the historic footprint of the Minidoka National Historic Site, but the project poses similar adverse impacts on the integrity of numerous prehistoric/historic sites in the area, such as Wilson Butte Cave, Oregon Trail routes, and Craters of the Moon.
Individual	CUL01 - 1 - General Cultural Resources	Environmental studies give substantial weight to Salmon, Sage Grouse, Raptors, and any activist or politically listed endangered species or agenda. What about, for example, the Kelton Freight Line Trail, as I understand it, it went through Lincoln County entering at or near Star Lake (Draft Horse watering site) and proceeded north between Dietrich Crater and Dietrich Butte, crossing the Little Wood River near Marley road and proceeding through the Cottonwood slough area. How many other roads, Native American sites, pioneer trails and historic areas are in the proposed area? During construction will the project identify, protect and properly deal with the discovery of such areas or simply hide or ignore them. Though not actively mapped, these sites do exist.
Idaho Office of Energy and Mineral Resources	CUL01 - 1 - General Cultural Resources	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. Historic Properties o Impact on historic properties listed on or eligible for listing on the National Register of Historic Places.
Twin Falls Historic Preservation Commission	CUL01 - 1 - General Cultural Resources	The enormity of the proposed wind farm with the hundreds of massive wind turbines, sprawling corridors, miles of transmission lines, seven substations, and hundreds of miles of roads and pathways poses a huge threat to cultural resources and historical sites within Twin Falls County, within the proposed project area itself, and beyond the perimeters of the planned energy project. Twin Falls County Impacts The wind energy project would definitely affect the aesthetics of several National Register of Historic Places (NRHP) sites in Twin Falls County, sites such as the nineteenth-century Rock Creek Station and Stricker Homesite on the Oregon Trail, the Brose House, built in 1905, the Milner Dam, completed in 1905, and the Oregon Trail, dating to the 1840s, and the Hagerman Fossil Beds National Monument /Oregon Trail, located on the bluffs of the Snake River near the county's western border. Their stories reflect the unique contributions to the heritage and development of our county, and their settings provide scenes reminiscent of what emigrants, homesteaders, early settlers, or communities may have observed decades ago. Such authenticity enhances the heritage sites, providing more meaningful experiences for those who visit these landmarks, like the estimated 2000 visitors who toured the Rock Creek Station and Stricker Homesite six miles south of Hansen, Idaho, in 2019. The open views of the mountains to the north, the hills to the south, and the rolling lands to the east and west allow imaginations to step back to a time of covered wagons, dusty trails, and uncertainty about the trail ahead. For a project like Lava Ridge to interrupt these open views with hundreds of wind turbines the height of Seattle's Space Needle, a network of transmission lines, and necessary infrastructure is an intrusion on the aesthetics and quality of these historical sites. Their heritage significance cannot be understated, and their viewsheds are an integral part of the story, deserving of protection. To allow for the development of the enormous wind farm would negate the time, effort, and money expended by the TFCHPC researching and nominating the above-mentioned sites on the NRHP. Additionally, such visual intrusions would not enrich the knowledge of future generations who would visit and learn from the current NRHP sites in Twin Falls County. Twin Falls County has over 1200 historic properties in the foothills of the South Hills, along the Snake River Canyon rim, and in the ranch and farmlands surrounding Twin Falls. The viewsheds and historic integrity of the sites would be affected by the presence of a wind farm to the north and its infrastructure. Planned construction of transmission lines through the county east of Twin Falls poses a threat to the research and documentation of these sites. Potential discoveries of significant artifacts / sites may be destroyed through the construction process of the transmission lines.
Twin Falls Historic Preservation Commission	CUL01 - 1 - General Cultural Resources	Proposed Project Area Impacts On Site Based on our experiences with reconnaissance level surveys, we know how valuable undisturbed surface artifacts are in documenting and interpreting a site. The Lava Ridge project would require extensive excavation in creating roads, wind turbine pads, transmission line supports, equipment pathways, substations, and storage buildings. Such wide-spread disturbances of the surface would literally destroy surface and sub-surface artifacts and any cultural features associated with them. The context of the story within a site would be completely lost and could never be recovered. The unique volcanic formations within the proposed project area would be threatened by the placement of turbines and associated construction activities. Among the volcanic features endangered are the pressure ridges and lava tube caves. Evidence indicates that both features were highly utilized by Native Americans over thousands of years and by Euro-American settlers / travelers/emigrants within the last 170 years. These natural formations provided observation points and shelter, besides serving as landmarks. Petroglyph Cave, Black Ridge Butte and Cave, Wilson Butte or Rocky Ridge, and Wilson Butte Cave are a few of the significant sites, with Wilson Butte Cave being one of the most significant Native American sites in North America. To the east, the elevation of Wilson Butte (Rocky Ridge) itself provides an amazing view of the region in all directions. Constructing wind turbines, roads, etc., in or near any of these sites mentioned would destroy the geologic landscape and cultural resources associated with use of those landscape features. With a record of human occupation in this planned project area that stretches back 15,000 years, everything possible should be done to protect the area and its story from destructive construction undertakings. Extensive projects like wind farms should not be allowed on wide open lands rich in cultural and natural resources.
Idaho Heritage Trust	CUL01 - 1 - General Cultural Resources	The proposed project by the Magic Valley Energy, LLC is a positive move for green energy. However the geographic area of the Snake River Plain is historically and culturally significant with archaeological sites dating back 10,000 years. Careful planning for the location of the wind turbine corridors can help prevent irrevocable damage to our cultural landscapes.
Idaho Heritage Trust	CUL01 - 1 - General Cultural Resources	In addition to the Minidoka National Historic Site, we deem the following sites to be of great significance to the cultural heritage of Idaho to be protected from any potential damage during construction, service, or decommission and preserved from any visual interference due to the looming presence of the 32-story turbines: Wilson Butte Cave Hidden Valley The Goodale Cutoff and Oregon Trail sites Minidoka National Historic Site
National Park Service	CUL01 - 1 - General Cultural Resources	The proposed action has the potential to adversely impact the historic character of Minidoka NHS and, potentially, the Oregon NHT.
National Park Service	CUL01 - 1 - General Cultural Resources	Concerns Oregon National Historic Trail: the project may adversely impact high potential historic sites on the Oregon NHT, which is a component of the National Landscape Conservation System. High potential historic sites, as defined by the National Trails System Act, are historic sites related to or near the route that provide opportunities to interpret the historic significance of the trail during the period of its major use. Criteria for consideration as high potential sites include historic significance, presence of visible historic remnants, scenic quality, and relative freedom from intrusion (P.L. 90-543, as amended through P.L. 116-9, March 12, 2019). The designated alignment of the NHT crosses approximately ten miles south of the project, and viewshed analysis indicates that the project may be visible from Stricker Store/Rock Creek Station and the Milner Ruts, both of which are designated high potential historic sites. The Stricker Store/Rock Creek Station was listed in the National Register of Historic Places in 1979 (NR #79000810) and includes the Rock Creek Store, Stricker House, a pioneer cemetery, and several outbuildings. The historic site served as the first trading post on the Oregon NHT west of Fort Hall, Idaho, and was an emigrant campsite prior to the establishment of the store. The Milner Ruts, located within the Bureau of Land Management's Milner Historic Recreation Area, are original ruts created by wagons traveling the Oregon Trail. Both high potential historic sites have developed infrastructure related to and interpreting the Trail experience and are open to visitors. The introduction of wind turbines may alter the historic setting and impact opportunities to vicariously share the experience of the original users of the historic route.

Commenter	Comment Code	Comment Text
Individual	CUL01 - 1 - General Cultural Resources	What about, for example, the Kelton Freight Line Trail, as I understand it, it went through Lincoln County entering at or near Star Lake (Draft Horse watering site) and proceeded north between Dietrich Crater and Dietrich Butte, crossing the Little Wood River near Marley road and proceeding through the Cottonwood slough area. How many other roads, Native American sites, pioneer trails and historic areas are in the proposed area? During construction will the project identify, protect and properly deal with the discovery of such areas or simply hide or ignore them. Though not actively mapped, these sites do exist.
Individual	CUL01 - 1 - General Cultural Resources	Archaeology studies: Has this area been thoroughly explored and documented? Wilson Butte Cave has been (see enclosed document). Where is the source of wind coming from Kimama Cave and other wind caves? Will blasting and road construction for pad sites effect lava tubes, caves or other archaeology sites? PS: Archaeology document from "SNAKE The Plain and It's People" published by Boise State University in 1994. Library of Congress Card No. 93-073992 ISBN: 0-932129-12-9.
Individual	CUL01 - 1 - General Cultural Resources	Another concern is the disturbance of Wilson Butte Cave and the effect of the project on cultural resources in the area. An in depth archaeological survey needs to be accomplished.
Individual	CUL01 - 1 - General Cultural Resources	Cultural impacts to Native American sites and to the Shoshone-Bannock Tribes. There are many Native American sites (many that are 10,000 years old or older such as Wilson Butte Cave) within the proposed project area that would either be threatened or destroyed from the construction and maintenance of the project. Once destroyed, these sites and artifacts would be gone forever. Viewscapes affected. This project would affect the viewscapes of the surrounding farming communities as well as many historical sites throughout the region. Viewscapes add value to these historic properties and should be strongly considered in this proposed project.
Individual	CUL01 - 1 - General Cultural Resources	The integrity of the land must be a first priority... sacred sites must be recognized and their cultural importance prioritized!
Individual	CUL01 - 1 - General Cultural Resources	NEPA guidance states, The EIS must identify all the indirect effects that are known and make a good faith effort to explain the effects that are not known but are reasonably foreseeable (40 CFR 1508.8(b)). Beyond the cultural landscape impacts to the Minidoka National Historic Site, there are questions on the impacts to the cultural landscape for the Northern Shoshone and Bannock communities, wildlife habitat and impacts, ambient temperatures, and cumulative noise.
Individual	CUL01 - 1 - General Cultural Resources	Writing here to express concern about the lava ridge wind project being built adjacent to Minidoka internment camp and on Shoshone-Bannock tribal land. I would like to see an end to such destruction and for the First Nations history to live on.
Idaho Conservation League	CUL01 - 1 - General Cultural Resources	We are also concerned that the project as currently proposed may impact important historic and cultural sites, such as the Minidoka National Historic Site and areas of importance to the Shoshone-Bannock and Shoshone-Paiute Tribes. We strongly encourage the BLM and Magic Valley Energy/LS Power to work with the tribal governments, the National Park Service, and the Japanese American community to better understand these critical issues and take meaningful actions to respond to these concerns.
Idaho Conservation League	CUL01 - 1 - General Cultural Resources	The proposed Lava Ridge Wind Project is located in a vast area of southern Idaho rich in cultural history dating from prehistoric times and continuing into the modern era. We are concerned that portions of this project area will either directly or indirectly impact cultural or historic areas worthy of preservation. Magic Valley Energy/LS Power and the BLM must comply with several federal and state laws and regulations that are meant to protect these irreplaceable resources. These statutes include Section 106 of the National Historic Preservation Act and related Code of Federal Regulations, the Archaeological resources Protection Act of 1979, the Native American Graves Protection and Repatriation Act, Idaho Code title 67, Chapter 41, and Idaho Code title 27, Chapter 5 (Sections 27-502 through 27-504).
Idaho Conservation League	CUL01 - 1 - General Cultural Resources	Archaeologists have identified numerous lava tubes and caves containing pre-and protohistoric cultural remains throughout the region, and it remains quite likely that investigators will discover previously unidentified cultural resources during pedestrian surveys of the direct impact areas. The BLM and Magic Valley Energy/LS Power should avoid these resources whenever possible by relocating proposed roads, turbines, and associated infrastructure, and mitigate the impacts to these resources through excavation and data recovery efforts when necessary. The forthcoming EIS should include a comprehensive data recovery plan that details the types of resources within the project area, how Magic Valley Energy/LS Power, the BLM, and any associated subcontractors will proactively engage in applying pertinent research questions to data recovery. The DEIS should also discuss the process for the potential curation of recovered artifacts in a State Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO) approved repository. All such discoveries and any curation should be conducted in coordination with the Shoshone-Bannock and Shoshone-Paiute Tribes. These investigations should also determine indirect impacts to cultural resources from increased visitation and exposure during construction activities and increased travel on wind farm-associated service roads and near infrastructure facilities. The BLM should consider requiring mitigation options that could include fencing to protect particularly rare or sensitive archaeological sites, such as Wilson Butte Cave, as well as avoidance by relocating proposed turbines or infrastructure. National Historic Trails and Native American traditional cultural properties (TCPs) are two examples of rare or sensitive resources that we feel the BLM and Magic Valley Energy/LS Power should be respectful and sensitive towards by avoiding construction in these areas.
National Trust for Historic Preservation	CUL01 - 1 - General Cultural Resources	The National Trust also supports the consideration of other historic resources within the project scope in the Draft EIS, including archaeological resources and other National Register-listed and eligible properties already identified by the BLM and consulting parties.
Japanese American Confinement Sites Consortium	CUL01 - 1 - General Cultural Resources	JACSC requests that the BLM perform comprehensive environmental analysis to evaluate the cumulative impacts to both Minidoka National Historic Site, Craters of the Moon National Monument and Preserve, as well as a comprehensive inventory of other historic and cultural resources within the impacted area of the project. This review must include analysis of viewshed, light, noise, geology, hydrology, birds and wildlife, as well as the historic and cultural resources.
Individual	CUL01 - 1 - General Cultural Resources	Visitor experiences at important National Register properties and local destinations within 20 - 30 miles of proposed Lava Ridge infrastructure would also be affected and must be assessed. This includes resources like Rock Creek Station and the Stricker homeseite along the Oregon Trail, Craters of the Moon National Monument, Hagerman Fossil Beds National Monument, Lake Walcott State Park, Visitor's Centers along the Snake River.
Individual	CUL01 - 1 - General Cultural Resources	Direct impacts would result from ground disturbing activities that would be intensive within the proposed project area. Archaeological sites and features, and the landscape features and natural resources of importance to Native Americans would be jeopardized by these construction activities. Whenever possible, project infrastructure should be designed to avoid direct impacts, particularly at Wilson Butte Cave and within the historical footprint of the Minidoka National Historic Site. Unavoidable direct impacts must be subject to mitigation in consultation with interested stakeholders and Native Americans.
Coalition to Protect America's National Parks	CUL01 - 1 - General Cultural Resources	Last but not least, the RMP provides little useful guidance regarding the identification and protection of cultural resources within the RMP area. In essence, the RMP fails to comply with Section 110 of the NHPA, which requires federal agencies to identify, evaluate, nominate to the National Register of Historic Places, and protect historic resources within their jurisdiction. However, all the 1986 RMP says is: BLM will manage cultural resources so that representative samples of the full array of scientific and socio-cultural values are maintained or enhanced, consistent with State and Federal laws.
Coalition to Protect America's National Parks	CUL01 - 1 - General Cultural Resources	Comment #12: Consistent with NHPA Section 110 requirements, the DEIS should also include a section identifying National Register eligible cultural resources within the project area and describe what steps, if any, BLM has taken to protect those resources. If appropriate, BLM should prepare National Register nominations for any eligible but unlisted historic properties within the area. In general, the Monument RMP description of BLMs management of cultural resources within the RMP area is remarkably brief. All it says is: BLM will manage cultural resources so that representative samples of the full array of scientific and socio-cultural values are maintained or enhanced, consistent with State and Federal laws. See RMP p. 16. While the NPS-managed Minidoka NHS encompasses only about 500 acres of the original 33,000- acre footprint of the Minidoka War Relocation Center, a significant portion of the larger footprint of Minidoka overlaps thousands of acres of public lands administered by BLM. See BLM map below that illustrates the overlap. Section 110 of the NHPA requires federal agencies to manage and maintain historic properties under the jurisdiction or control of the agency in a way that considers the preservation of their historic, archeological, architectural, and cultural values. These responsibilities include the identification, evaluation, nomination to the National Register of Historic Places, and protection of historic resources. (Emphasis added.) As a result, BLM should specifically determine whether the broader agricultural landscape of Minidoka is eligible for listing as a rural historic landscape on the National Register of Historic Places. See National Register Bulletin (NRB) 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes.40 If this landscape is found eligible for the National Register, then BLM should submit a nomination to that effect to the Idaho SHPO in accordance with the Bureaus affirmative responsibilities under Section 110 of the NHPA.
Shoshone-Bannock Tribes	CUL01 - 1 - General Cultural Resources	As the BLM is acutely aware, the entire Area of Potential Effect (APE) for this Proposed Action is within the Tribes' traditional homelands and is part of the "unoccupied lands of the United States" which were reserved by the Tribes in their Fort Bridger Treaty of July 3, 1868, 15 Stat., 673, for off reservation subsistence hunting, fish and gathering. The Tribes have significant concerns with the development of public lands in the pursuit of profit at the expense of Treaty rights, cultural resources, local communities, and a myriad of wildlife species and their habitats. For these reasons, the Tribes must oppose the Proposed Action and request that the BLM deny the proponents request to construct this enormous wind energy project, in the heart of the Tribes homelands and Idaho's sage grouse habitat.
Shoshone-Bannock Tribes	CUL01 - 1 - General Cultural Resources	The Snake River Plain is identified as a component of our ancestral lands and our people roamed these lands and waterways from time immemorial in a seasonal round that sustained our unique culture. The Tribes have identified significant physical cultural resources in the area that will be impacted as a result of the proposed wind project. The Tribes have also identified a high potential for burial sites in the area; the loss of those cultural resources is not acceptable for the Tribes.

Commenter	Comment Code	Comment Text
Individual	CUL02 - 2 - General Native American Concerns	While it is commendable that this project pursues the use of wind to generate needed energy (a benefit to all), it runs the risk of alienating and hurting many people, particularly persons of color who have been historically oppressed, underserved, and underrepresented. Monetary benefits from this project can be calculated in dollars and cents, but the ethnic, cultural, and historical losses cannot. Once again, Americans native to this land (e.g., Shoshone Bannock, Shoshone-Paiute and other indigenous people) and others wronged by the U.S. Governments past discriminatory policies and programs will feel slammed again. The damages caused by insensitive and discriminatory policies and actions especially by our own legitimate government is priceless. Native Americans/American Indians and persons of Japanese ancestry were severely affected by the actions of the U.S. Government. Both groups lost their original ways of life, and both felt the sting of a U.S. Government that actively worked to force them to assimilate by undermining their ethnic heritage and attempting to destroy cultural ways of life. Now, the proposed 400 windmills show another example of profound disrespect and disregard to these groups by altering their sacred grounds, polluting their visual spaces and sound arenas, and disrupting abilities to honor and commemorate experiences that have significant historical and ethnic/cultural meaning.
Individual	CUL02 - 2 - General Native American Concerns	This project is more proof of the continuation of unlawfully taking the property of People of Color to enrich the White population. During WW 2, land and property were taken from their legal Japanese Americans owners. The former owners were incarcerated behind barbed wire encampments, forced to be drafted in the US Military. Racism and greed allowed the government to condone this land grab. Native Americans were forced on to reservations as the government took over the land of their ancestors. Then when oil was discovered on the Indian land, that land was taken and Osage Indian Tribes were murdered. Now land that the government set aside to be the Minidoka Historical site is going to be taken back to be used as a site for enormous wind producing energy. The size of these massive machines are 740 feet, and will be built on 73,000 acres including land where this historical site sits. Have we learned nothing about broken promises and the justification of white mans greed?
Idaho Conservation League	CUL02 - 2 - General Native American Concerns	We also recommend that the BLM examine how not just climate change but societal adaptations to climate change - such as this project - are affecting Native American communities: Increasing indigenous participation in climate-change initiatives is one potential solution for increasing the resilience of indigenous communities. Indigenous perspectives and traditional knowledges must guide climate-change assessment and adaptation to develop culturally appropriate strategies.
Individual	CUL02 - 2 - General Native American Concerns	I also ask that the site not impede upon lands sacred to indigenous groups. I believe there is a way to develop the project in a way that is mindful of the land's history and the different groups implicated. This may take more time and resources, but it would model a democratic practice that moves us forward while learning from the past.
Shoshone-Bannock Tribes	CUL03 - 3 - Native American Traditional Uses	The Proponent is requesting to utilize a substantial amount of public lands in Idaho to generate electricity for private monetary gain The APE includes 180,000 acres of mostly public lands to construct 400 wind turbines, 5 new substations, energy storage system, 150 miles of new access roads (359 total miles of access roads), 60 miles of underground lines, 28 miles of 230KV line, and 18 miles of 500 KV line that would contribute to the downward spiral of wildlife populations and cultural resources due to wildlife habitat loss and fragmentation; and, the permanent loss of tangible and intangible Tribal cultural resources. The Proposed Action would adversely impact the Tribes' guaranteed off-reservation Treaty rights through the suppression of wildlife populations and by diminishing the locations access and use by Tribal members continue to exercise Treaty reserved rights. The benefits of this Proposed Action will not be seen locally and the Tribes would shoulder the burden of conservation for species like sage grouse and mule deer; and, for the protection of non-renewable cultural resources.
Individual	CUL04 - 4 - Japanese American Concerns	Now, the DOI, this time through the BLM, is considering allowing an enormous windfarm to be constructed on the historic footprint of Minidoka, which for JAs, including myself, would be yet another grave injustice to our community. It would be a betrayal, a stab in the back. To designate a historic site, and then wreck it by placing massive wind turbines next to it, is inflicting yet another harm this time on the legacy of Japanese Americans. How dare you do this to us?! It is unconscionable. Since learning about this massive wind farm project, it has been in my thoughts non-stop, and I've had trouble sleeping. My family and entire lineage were incarcerated at Minidoka. I think about their suffering, and now the trauma that this project is causing to me personally. I am furious. I am hurt. I feel betrayed. In reading through the proposal, I do not see any acknowledgement by the Magic Valley Energy company or the BLM that you would be impacting Minidoka, and by extension the entire JA community in the US.
Individual	CUL04 - 4 - Japanese American Concerns	1. Who from the American Japanese community is advising BLM on the impact to our national history? 2. What role does BLM have in preserving national historic sites? 3. Would we put windmills at Auschwitz? NYC ground zero? Why or why not? An American of Japanese descent. We lost everything to eo9066, and most Americans don't know it happened or willfully argue it was just, despite Regan's clear apology. It happened to us, it could happen to you. Never again. Never again is now.
Individual	CUL04 - 4 - Japanese American Concerns	What do you think you are attempting to do? Donald Trump is no longer president. If you haven't noticed, President Joe Biden is now President. We Japanese Americans have friends and backers in Congress and throughout America. Asian Americans are the fastest growing population in America. Have you noticed the racial population change in America? Go outside. Look around. The word is out on you and your project.....nationwide. Expect resistance.....a lot of it.
Individual	CUL04 - 4 - Japanese American Concerns	We must never incarcerate American citizens again without adequate legal protections and we must not destroy the personal and emotional impact that Minidoka plays in this goal.
Individual	CUL04 - 4 - Japanese American Concerns	Don't erase history by placing a wind turbine by Minidoka. Is this being proposed because the prisoners weren't white?
Individual	CUL04 - 4 - Japanese American Concerns	Please reject building on the Bureau of Land Management (BLM) property adjacent to Minidoka, 25 miles northeast of Twin Falls, Idaho. The history of Japanese American history is too important and must be preserved. This is American history that helps American to learn that dark part of our history.
Individual	CUL04 - 4 - Japanese American Concerns	The Minidoka National Historic Site is integral to Japanese-American history. The Lava Ridge Wind Project endangers the site. I urge you to respect our community and halt the development of the project.
Individual	CUL04 - 4 - Japanese American Concerns	Totally against this. It's disrespectful to the American citizens who were imprisoned at Minidoka during WW II.
Individual	CUL04 - 4 - Japanese American Concerns	During my visits to visits to Minidoka, I was able to experience this sense of isolation and gain a much better understanding of the daily lives of my parents and older brother in Minidoka. The proposed wind project would directly impair this fundamental resource and value. Commemoration and Healing: Minidoka provides a place for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history. I lived for over 70 years with questions about my mother's life and the deep loss of never knowing her. Minidoka NHS helps heal the pain of losing her and provides me with a sense of closure. Minidoka also commemorates her life and the sacrifices she made to raise me before her passing. The wind project would dishonor her memory and the memories of those who died in camp and make it harder for NPS to commemorate the lives of over 13,000 people who were incarcerated there.
Individual	CUL04 - 4 - Japanese American Concerns	Public Understanding, Education, and Involvement: Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today. I have experienced first-hand the power of pilgrimages to educate the public about the incarceration. Minidoka is an important educational resource and part of the fabric of our nations educational system. I hope my nieces and nephews and their children will have the opportunity to experience Minidoka s sense of isolation and remoteness, without several hundred spinning wind towers occupying almost a third of the parks viewshed creating a visual wall of towers.
Individual	CUL04 - 4 - Japanese American Concerns	Moreover, if BLM approves the project in its current proposed location, the Biden Administration will be sending the message that it values sage grouse conservation more than it does protecting a unit of the National Park System that tells the story of one of the most shameful and racially discriminatory episodes in American history. If the mantra of environmental justice means anything to the Biden Administration and Secretary Haaland, it must mean denying the Lava Ridge requested permits, thereby telling the Japanese American community that our history of discrimination matters just as much as the conservation of sage grouse and other cultural/historical sites in the Park System.
Individual	CUL04 - 4 - Japanese American Concerns	Kindly honor and respect the fact that this area is home for many Native Americans/American Indians and former home to thousands of persons of Japanese ancestry who were incarcerated at nearby Minidoka War Relocation Authority Camp (concentration camp). The Lava Ridge Wind Project needs to be situated in an appropriate location that will not harm, hurt, or oppress the population.

Commenter	Comment Code	Comment Text
Individual	CUL04 - 4 - Japanese American Concerns	To consider building wind turbines across this sacred space is adding insult to injury. It denigrates the experience and shows the Japanese Americans that once again its government wants to erase its ugly past and instead cover it up with renewable power and profit. It is time to view these decisions with a lens on empathy and equity. This is a terrible injustice and I strongly urge you to reconsider siting this project at this location.
Individual	CUL04 - 4 - Japanese American Concerns	Please do not install the Lava Ridge Wind Project or any wind farm project at or near our sacred Minidoka National Historic Site. I strongly believe that this wind project would mark a step backward in the U.S. governments acknowledgment that the World War II mass incarceration of my family and community was wrong.
Individual	CUL04 - 4 - Japanese American Concerns	I am shocked that in many parts of the country people still know little to nothing about the Japanese American Internment. The stories of those who lived there and those who have followed are crucial, as is the preservation of the land where the incarceration took place. I strongly agree that racial justice and renewable energy can co-exist. If the huge wind project goes forward without consideration for Minidoka as a remembrance site for a crucial, horrific event in history, that history will be forgotten, and new massive violations of human rights are more likely to occur.
Individual	CUL04 - 4 - Japanese American Concerns	Places like Minidoka must be honored and preserved in a meaningful way to ensure that we never forget what is at stake and how quickly our ideals can be eclipsed by hate. That means preserving, to the furthest extent possible, the context of the camps. That is, the desolate nature of the surrounding environment. So that visitors can truly imagine what it would have been like to spend every day, behind a barbed wire fence, looking out at a place with little hope. It is hard for many people to believe that the U.S. government ever did this to its own citizens; it's even harder for people to put themselves in the shoes of the victims. The land around Minidoka has meaning and purpose to Minidoka itself.
Individual	CUL04 - 4 - Japanese American Concerns	By surrounding Minidoka with hundreds of giant wind turbines, the project would make it hard for my family and future generations to draw strength and solace from future pilgrimages. It will make it hard to experience that same sense of remoteness and isolation experienced by Japanese Americans during World War II. LS Powers proposal would dishonor our nations acknowledgment that the incarceration of Japanese Americans was wrong. It will destroy Minidoka's ability to commemorate our parents and grandparents and serve as a place of healing and learning and it will desecrate sacred ground. It isn't worth erasing history that needs to be preserved, as we have been so accustomed to doing in this nation.
National Park Service	CUL04 - 4 - Japanese American Concerns	Ethnographic groups are people who for two generations or more have used or appreciated the resources of a place for work, religion, recreation, education, or other traditions that help retain their cultural identity. The Japanese American community has more than two generations with cultural identity and traditions around Minidoka NHS. Minidoka NHS is a site of conscience, a place of memory that prevents the erasing of the past to ensure a more just and humane future, and a member of the International Coalition of Sites of Conscience. The site offers opportunities to make connections between past injustices inflicted upon Japanese Americans during World War II by the federal government and contemporary human rights issues. Minidoka NHS is a pilgrimage site for Japanese American survivors and their descendants, with organized commemorative events happening at Minidoka since 1979. As stated in the Minidoka NHS Foundation Document, commemoration and healing and public understanding, education, and involvement are fundamental values of Minidoka NHS.Concern: Development of half-mile-wide corridors of wind turbines across more than 200,000 acres of southern Idaho lands could restrict Native American access to key ethnographic resources potentially impacting treaty-reserved rights. The proposed power generation corridors and infrastructure also have the potential to adversely affect the traditional cultural and religious values associated with any Indian sacred sites that may be within or near the project area. The natural soundscape is often a contributing element to the significance of ethnographic and spiritual resources. Noise created during turbine operation, persistent across the entire 30-year lifespan of the project, may intrude on the quietness and natural soundscapes intrinsic to the cultural values associated with these kinds of resources. For Japanese American survivors and their descendants, Minidoka is a sacred site. The first organized commemorative event was held in 1979 with a large ceremony associated with the designation of the site on the National Register of Historic Places. Subsequent pilgrimages occurred between 1979 and 2003, at which time the event transitioned to an annual event attended by survivors, descendants, and friends. Since 2003, hundreds of survivors and their descendants have attended the annual pilgrimages, coming from as far away as Japan. The Lava Ridge Wind Farm project may negatively affect the desire of Minidoka's survivors and descendants to make personal pilgrimages to Minidoka or to attend the annual pilgrimage. The Lava Ridge Project could impact their ability to consider Minidoka as a site of healing, commemoration, and reconciliation, where the government admitted a wrong by preserving the site and interpreting it for its civil rights lessons. Japanese Americans continue to have associations with specific natural features of the project area. These associations have been recorded through oral histories and are passed down through oral traditions. Historically, incarcerated Japanese Americans collected greasewood (Sarcobatus vermiculatus) and sagebrush for furniture and artistic projects. Greasewood objects from Minidoka and the stories associated with them are passed down from the survivors to descendants and the larger Japanese American community. Examples include the use of collected greasewood in the model apartment at Minidoka designed and built by world famous furniture designer, George Nakashima, and greasewood objects from Minidoka in the collections of Japanese American families (Nakashima, 1981). Similarly, incarcerated Japanese Americans collected large lava rocks for inclusion in Japanese style gardens in the developed areas of the camp, such as the Kogita garden and the entrance garden designed by famed garden designer Fujitaro Kubota (Minidoka Cultural Landscape Report; Eaton, 1952; Tamura, 2013). The large lava rocks from the Kogita garden were transported to Seattle following WWII and are elements of the family's Japanese-style garden in Seattle. The NPS recommends a thorough analysis be conducted on this projects potential for both short- and long-term impacts on ethnographic resources.
Individual	CUL04 - 4 - Japanese American Concerns	Symbolically this proposal is a violent erasure of our unique Japanese American history and heritage. LS Power's proposal would dishonor our nation's acknowledgement that the forced removal and incarceration of Japanese Americans was wrong. It will destroy Minidoka's ability to commemorate and honor our parents and grandparents and serve as a place of healing and learning. It will desecrate this sacred ground on which my ancestors once lived. I urge you to consider the many voices and experiences of the Japanese American community. Namely the experiences of those like me, who are descendants of Minidoka survivors. With us in mind please reconsider and reject the Lava Ridge Wind Project as proposed.
Individual	CUL04 - 4 - Japanese American Concerns	The proposal by LS Power, a NY private equity firm, seeking approval to build hundreds of giant wind turbines will absolutely dishonor our country's acknowledgment that the incarceration of Japanese American was wrong by desecrating sacred ground and significantly interfering with the powerful experience so many have when they make a pilgrimage to this very important historic site.
Individual	CUL04 - 4 - Japanese American Concerns	I am a fourth generation Japanese/Chinese American living in the NW. Like many JA families who were incarcerated, my grandparents did not discuss their lives at Minidoka. It is only in more recent generations that we are beginning to heal through education, discussion and community gathering. There is no longer a Japantown in Portland where I live and our stories are very buried. I had the opportunity to visit Minidoka with my mother and auntie the summer before COVID struck. It was a way to talk about our own family trauma while connecting with a community of people who have similar histories. While incarceration at Minidoka was an event of the past, it is still a trauma we are unpacking. This particular injustice is important for JAs and non-JAs alike in better understanding civic injustice, family and community separation, place, policy and labor. It is important in supporting all of our rights.
Idaho Falls Japanese American Citizens League	CUL04 - 4 - Japanese American Concerns	the placement of the wind turbines will be detrimental to the sacred story of incarceration, loss and the military service of those who gave their lives to defend our freedoms. The desolation will be replaced with a view of and noise from hundreds of extremely large wind turbines. The sacred way of honoring ancestors will be disturbed when JA individuals return to Minidoka on pilgrimage to honor their lost loved ones. It will also be heartbreaking for those incarcerates who are still alive and visit Minidoka. Their sacrifices and painful loss during WWII will no longer be honored. It will instead be interrupted by the disturbance of wind turbines that are larger than any in the state of Idaho.
Individual	CUL04 - 4 - Japanese American Concerns	LS Powers proposal would dishonor our nations acknowledgment that the incarceration of Japanese Americans was wrong. It will destroy Minidoka's ability to commemorate our parents and grandparents and serve as a place of healing and learning. It will desecrate sacred ground.
Individual	CUL04 - 4 - Japanese American Concerns	I am writing this message to express my deep concern that the Lava Ridge Project, as proposed near and on the larger Minidoka National Historic Site, will quite significantly spiritually damage the power of place of this important monument to civil rights. Spiritual Damage: We have all observed how many high-rise downtown districts of cities stand out from great distances away in the areas surrounding a city. Imagine 300+ of those standing out high-rises having heights of 50 to 75 stories or more. Imagine that the buildings are spaced out much more apart than is common in dense cities. Then imagine the upper half+ of each building in constant motion across a view width wider than the average person can see at one time. Then imagine that the viewer is only 2 miles away from the closest moving building. Then realize that the buildings are actually very tall spinning wind towers. I certainly hope that they are all together at least as silent as the countryside. It is impossible for me to imagine anything less than heavy damage to the power of place of this important monument to civil rights. Please do not allow the proposed great spiritual damage to Minidoka. Minidoka is someone's heritage and valuable beneficial learning for all.
Minidoka Pilgrimage	CUL04 - 4 - Japanese American Concerns	If approved, this project will mark a giant step backward in our nation's acknowledgement that the incarceration was wrong and that these sites of shame should be preserved as lasting educational resources for the benefit of current and future generations. We respectfully request that BLM consider the impact that this would have on our ability to tell our stories of pain, courage and healing.
Friends of Minidoka	CUL04 - 4 - Japanese American Concerns	We strongly oppose the Lava Ridge proposal. It is too close to the park and would dishonor our nations commitment to acknowledging that the incarceration was wrong and preserving sites of incarceration unimpaired for future generations.
Friends of Minidoka	CUL04 - 4 - Japanese American Concerns	If approved, LS Powers proposal will serve as an affront to the Japanese American and Asian American Pacific Islander (AAPI) communities and mark a step backward in the U.S. Governments commitment to acknowledging Japanese American and AAPI contributions to our nation's history.
Friends of Minidoka	CUL04 - 4 - Japanese American Concerns	During the 1940s, our government betrayed the Japanese American community by taking away our freedom, property, and livelihoods. If approved, the Lava Ridge Wind Project would mark a second betrayal by our own government by dishonoring our past and damaging our future. Please consider the impacts of this second betrayal on our community's faith in our nation to live up to its full promise. During her confirmation hearing, Secretary Haaland said that she will work my heart out for everyone, including [p]eople of color whose stories deserve to be heard. We are people of color. Our stories deserve to be told through Minidoka National Historic Site, without 400 spinning wind turbines as tall as 74 story buildings, dishonoring our sacred ground and violating environmental justice.

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Oregon Physicians for Social Responsibility	CUL04 - 4 - Japanese American Concerns	Oregon PSR is an organization that strongly supports a just transition to 100% clean energy, and has worked on many campaigns to do just that. We know that our clean energy future will necessarily include a significant commitment to wind power. However, key to this just transition is ensuring that historically marginalized communities have a say over where and how clean energy projects are sited, so as to not replicate the injustices of the past. We are writing to express our concern that the siting of this project where it will detract from the experience of visitors to the Minidoka National Historic Site is not appropriate, and that instead, other sites where it will not have such a negative cultural and historical impact should be sought out. We urge you to listen to the comments of individuals and organizations connected to those who were incarcerated at Minidoka as you decide where to site this project.
Individual	CUL04 - 4 - Japanese American Concerns	I hope the Department of the Interior will not approve the Lava Ridge Wind Project. Minidoka is a site sacred to those of us born there as well as to families forced to live there. LS Powers proposed wind project will dishonor the memory of my mom and dad and thousands of others who suffered solely because of their race.
Individual	CUL04 - 4 - Japanese American Concerns	<p>I am a descendant of the incarceration, and this site is immensely important to my family, my community, and our nation. For the Seattle Japanese American community, the Minidoka site is our gateway to the past. I attended the Minidoka Pilgrimage with my grandmother and, though she was incarcerated at a different site, the experience was eye-opening. I cannot fathom how my family's experience of healing and learning on the pilgrimage would have been impacted by the intrusive project proposed to you.</p> <p>This is a sacred site for our community on many levels, but it is also a sacred site for any American who understands the importance of our history and is compelled to ensure it is not repeated. It is an irreplaceable site: the experience of looking out into the expansiveness, beyond the barbed wire fence, and feeling connected to the past, is like no other. It is not something that can be taught in a book.</p> <p>My community has endured such pain and loss at this site and has engaged in beautiful healing and reflection. It is at once a marker of the horrors inflicted on us and a reminder of the depth of our strength. To impose such a project would rob us of our remembrance and set us back in our mission for dignity and healing.</p> <p>It is terrifying to think that the integrity of our sacred Minidoka site could be stripped away. I think of our ancestors, who we do our very best to honor but whose legacy may be disrespected by this project despite our best efforts. I think of our survivors, who understand better than anyone the importance of this sites past and present. And I think of the future generations, especially those who have yet to visit the site and now may never be able to experience it.</p> <p>I implore you to carefully consider the impact of this project.</p>
Individual	CUL04 - 4 - Japanese American Concerns	What was once a source of shame for many in the Japanese American community, has now become a sacred place to commemorate the injustices upon our community during WWII and one part of our efforts to ensure that our country never forgets the injustice of Japanese American incarceration during WWII. Placement of the Lava Ridge project in such close proximity and as such an invasion upon the historic viewshed of the Minidoka site would be an insult to the importance of the experience of those who were incarcerated there.
Individual	CUL04 - 4 - Japanese American Concerns	The imprisonment of the Japanese people perpetrated by our government was a racist and shameful act. To even consider locating a very large, very noisy wind farm in such close proximity to this place of healing is offensive and beyond insensitive.
Individual	CUL04 - 4 - Japanese American Concerns	I am a teacher and support alternate sources of energy for our fragile environment. However, I do not understand the selection of using these sacred grounds to install such a gigantic project. Please reassure our community, that this is not yet another example of disregarding the interests of people who have historically been marginalized to advance the development of large industries.
Individual	CUL04 - 4 - Japanese American Concerns	So now, here we are, with what feels like another effort at Anti-Asian erasure...to erase this history as if it never existed. I cannot stand by without speaking up. To place wind turbines so close to this National Historic Site seems another act of Anti-Japanese discrimination. Japanese were visually removed from sight to the most desolate places, like MINIDOKA. And now, there is a strong chance that Japanese American history will be visually removed, as well.
Individual	CUL04 - 4 - Japanese American Concerns	Any alterations to the site of the former Minidoka War Relocation Camp would be an erasure of my ancestral heritage and deeply offensive to me as an American. The injustices inflicted on my family due to racial profiling and government sanctioned racism must be talked about, the history preserved, and the public educated so that it will not happen again.
Individual	CUL04 - 4 - Japanese American Concerns	If the proposed wind farm is situated partly within the boundary and viewshed of the former Minidoka concentration camp, it will be an insult to the memory of my mother and grandmothers suffering. When I visit the location of first three years of my life I do so to honor the hardships that my family endured to make the best of the unfortunate and terrible experience. An experience so terrible that my poor grandmother KaneFunai was not able to accept and decided ending her life was better than to endure the situation in camp.
Individual	CUL04 - 4 - Japanese American Concerns	<p>The Minidoka National Historic site also serves as a place for healing. My mother, father, aunt, cousins, my spouse and my own children have attended the Minidoka Pilgrimage at the site and learned more about this history, heard their relatives stories of pain, witnessed the healing process that comes with acknowledging the wrongs and enabling to have a deeper sense of identity and community. This is the power of place. My mother talked about her shame with others and felt a kind of reconciliation and connection with the community. Not only was this meaningful for our family, but for friends who also attended and the greater community who shares this local and national history.</p> <p>The current site of the Lava Ridge Wind Project sends the message to our community and greater Southern Idaho that our voices don't matter, that we never even had a place at the table, re-traumatizing those who experienced the injustice of the incarceration nearly 80 years ago.</p> <p>I support renewable energy projects. Climate change is definitely one of the most pressing issues of the day. However, I was deeply disappointed and angered that there was little regard for the Minidoka community. This community is comprised of more than one group. During WWII the WRAs assimilation plan spread Japanese Americans across the country. This project is sending a shockwave across the country.</p>
Individual	CUL04 - 4 - Japanese American Concerns	I know it is not your intention to do harm, but the plan as it is will damage not only the Japanese American community, but all of American society, for an injustice to some is an injustice to all. Without proper memorialization of the mistakes of the U.S. government, we are destined to make the same mistakes again and again, which is a disservice to all Americans.
Individual	CUL04 - 4 - Japanese American Concerns	For many Japanese Americans, Minidoka is part of family pilgrimages. As elders speak of their experience, a pivotal time that changed lives, it is important to preserve the full Minidoka reality. LS Powers proposal will destroy our understanding of this time. It will diminish our comprehension of what can happen to US citizens and in the parlance of today, Others, when a government makes decisions based on hysteria and lies.
Individual	CUL04 - 4 - Japanese American Concerns	Further, considering the profound cultural and historical importance of the Minidoka area, I am concerned about the impact this project would have on the Japanese American community.
Individual	CUL04 - 4 - Japanese American Concerns	These sites are considered sacred to the survivors and descendant communities, many of whom pilgrimage to them annually. To me, this project is absolutely unacceptable. To implement it will be a grave offense done to not only those within the Japanese American community, but to anyone who cares about preserving American history.
Individual	CUL04 - 4 - Japanese American Concerns	Consistently throughout American history, companies and government have disregarded and disrespected sacred historical lands that are deemed shameful history and silenced in vain. This project will be adding to this silenced part of American history.
Portland Japanese American Citizens League	CUL04 - 4 - Japanese American Concerns	The Lava Ridge proposal would be a slap in the face for the 120,000 US citizens that were forcibly incarcerated by the US government during World War II and for the families of the 13,000 people that were held at Minidoka. Japanese Americans have already suffered terrible pain and losses. This project would take away a place that provides so much healing for the members or Portland JACL and the Japanese American community with ties to the Pacific NW region.
Japanese American Confinement Sites Consortium	CUL04 - 4 - Japanese American Concerns	<p>Today, the remote and agricultural landscape contributes to the sites historical integrity. Japanese Americans appreciate NPS and DOIs commitment to protect Minidoka's fundamental resources and values unimpaired for future generations. In the last thirty years, Congress and Presidents of both parties have taken official actions to acknowledge that the incarceration was wrong. These actions acknowledge that the government devastated entire communities, separated families and contributed to intergenerational trauma that continues today. Earlier this year, to implement President Bidens Executive Order to advance racial justice, the Secretary of Interior Deb Haaland announced a funding initiative to help NPS tell the story of Minidoka and other sites important to people of color.</p> <p>If approved by the BLM, the LS Power Lava Ridge Wind Project would mark a step backward in the U.S. governments acknowledgment that the incarceration was wrong.</p>
Japanese American Confinement Sites Consortium	CUL04 - 4 - Japanese American Concerns	This project would dishonor victims of racial prejudice and would be a step backward in the governments reconciliation to acknowledge the injustice of the wholesale incarceration of Japanese Americans.
Individual	CUL04 - 4 - Japanese American Concerns	While expansion of our renewable energy sources is a must, it seems wrong to put this wind project in a location that will distress to the Japanese American community, who will have to sacrifice the character of this historic marker of the internment. Please consider a different location that does not infringe on this location of historical significance for all Americans. Thank you for your consideration.
Individual	CUL04 - 4 - Japanese American Concerns	E.O. 14008 also speaks to Environmental Justice as it relates to the siting of power plants and I would argue that the intent of this provisions was not to just focus on the siting or coal and gas plants but also the citing of wind farms overtop of sites that have been set aside to recognize the injustices that were served upon a people because of their ethnicity and heritage. I would find it deeply offensive to have this place, however painful it may be to remember for the families that lived there, desecrated with the installation of wind

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		turbines on the site of the original camp. The impacts of this need to be fully investigated and quantified by the Idaho State Historic Preservation Office, the National Park Service, the organizations that have been established to advocate for the Minidoka NHS, the Friends of Minidoka, and the Japanese American Community at large.
Individual	DATA01 - 1 - General	The impact statement for this project should cover all impacts, at all phases of the project's lifetime, i.e. 'cradle to grave.' Unused towers should not be 'orphaned' and costs for removal should be covered by Magic Valley Energy.
Individual	DATA01 - 1 - General	How much will the Lava Ridge Wind Project disrupt this area and change it forever so that it will not be able to be reclaimed?
Idaho Recreation Council	DATA01 - 1 - General	To ensure that good decisions are made concerning recreation, please work with the local clubs and users to make sure that all roads and trails are included on your maps. Complete information needs to be available so folks can make informed decisions.
Individual	DATA01 - 1 - General	<p>It is the massive scale and unique location of the proposal that requires a wide, deep and comprehensive EIS. The negative impacts could be Regional. LR impacts will be nothing comparable to a few strings of 5-10 300ft turbines like the ones that exist. LR exceeds and expands the sphere of influence on a scale beyond all existing projects. Beginning with measuring the impacts of the two year construction phase (how many trucks per day to/from Shoshone R/R? Traffic/Road?) And fully understanding the long term operational consequences demand that the EIS corresponds with same scale analysis.</p> <p>Wind is the dominate daily environmental factor on the Snake River Plain. The potential impacts of erecting a mini Mt Everest must be assessed. Not just the Flora and Fauna, but nearby private properties and their uses. Will wind vortexes effect local farming conditions, over-head sprinkler applications, temperature changes? Will livestock use remain?</p> <p>The devastating impacts to Minidoka are inherent if LR is built. But the potential negative impacts to a significant area of Magic Valley are distinctive and unknown. This massive proposal triggers a mirror analysis and comprehensive response to fully evaluate and address the complex and unprecedented impacts.</p>
National Parks Conservation Association	DATA01 - 1 - General	We note that the different proposed transmission routes would have different impacts on resources and those should be analyzed in the EIS as connected actions.
U.S. Environmental Protection Agency	DATA01 - 1 - General	EPA recommends that the DEIS for this project include information on the projects potential impacts on natural resources in the analysis area and identify any necessary measures to avoid, minimize and mitigate those effects. This will involve the delineation and description of the affected environment, indication of the impacted resources, the nature of the impacts, and proposed mitigation measures to reduce those impacts. Providing adequate information in the DEIS on the following topics will be especially helpful for decision-makers and the public.
U.S. Environmental Protection Agency	DATA01 - 1 - General	Indicate how roads in the analysis area currently impact resources, including water quality, and describe the change in road miles and density that will occur due to the proposed project.
Individual	DATA01 - 1 - General	<p>Geographical Information Systems (GIS) Use</p> <p>Because of maps and GIS information already provided by BLM it appears BLM is using GIS software to aid in evaluating the proposed Lava Ridge Wind Project. Since BLM appears to be using GIS software for this project, I am requesting that BLM use the Geographic Names Information System (GNIS) database along with archeological, cultural, and biological databases, and similar databases available to it, when evaluating possible effects of the siting and operation of the proposed project.</p> <p>I also am requesting the possible effects be evaluated within a minimum one (1) nautical mile (nm) radius (or further if warranted) of each project road (temporary or permanent), project boundary line, each individual proposed project site (towers, etc.) or project activity (i.e., substations and transmission lines, ancillary facilities such as buildings or parking areas, and temporary construction workspace such as yards, staging areas, etc.).</p> <p>Finally, I'm requesting this information be made available to the public, except for those specific locations whose release may be prohibited by Federal law, in a downloadable format (i.e. ESRI shapefiles, ESRI geodatabases or functional equivalent) on a web site.</p>
Shoshone-Bannock Tribes	DATA01 - 1 - General	The Tribes do not support the use of cultural resource predictive models as the basis of decision making without cultural resource reports for the project area. Any significant findings must be assessed with a representative of the Shoshone-Bannock Tribes for that tribal perspective input.
Star Lake Grazing Permittees	DATA02 - 2 - Inadequate Analysis/Inaccurate Data	<p>However, based upon the Map appended to the Notice, a material portion of the proposed project is proposed to be placed upon the public lands within the Star Lake Allotment, as illustrated on the map below:</p> <p>See also Star Lake Allotment Map in Notice at PDF page 7 compared to entire Project Map in Notice at PDF page 5. The Notice seemingly downplays this significance in its Preliminary Disturbance Estimation Summary which is appended to the Notice at PDF page 6, by stating that -- while the Star Lake Allotment is inclusive of 98,139 acres -- the Construction Disturbance Acres will be only 2,833 acres, and the Routine Operational Disturbance Acres will be only 926 acres. See Notice at PDF page 6 (wherein BLM estimates the number of acres relative to the wind turbines, the 34.6 kV aerial collector lines, the 34.5 kV buried collector lines, the junction boxes, the 230 kV transmission lines, the 500 kV transmission lines, the pull and tension / splice sites, the temporary road and crane disturbance, the substations, the battery storage facilities, the O&M facilities, the staging yards and batch plants, the ADLS, and the permanent met towers (hereinafter referred to as Wind Structures)). Permittees take exception to these acreage figures particularly when one analyzes (as BLM should do in any NEPA document) the zone of impact and influence of the Wind Structures (construction, operation, and maintenance) upon the public lands within the Star Lake Allotment as to the Permittees annual authorized Permitted Use and Permittees annual authorized public land range improvements use, as well as maintenance.</p>
BlueRibbon Coalition	DATA02 - 2 - Inadequate Analysis/Inaccurate Data	BRC reached out to project manager, Kasey Prestwich on October 5, 2021. We are concerned that the BLM does not have the most accurate information regarding recreation in this area. It was said that the area being analyzed is rarely used for recreation. We have consulted with various groups and organizations within Idaho as well as the local county commissioners who have shown popular routes and areas for outdoor recreation. It is concerning the plan states, recreational activities will be reviewed and evaluated. This information should already be reviewed and the BLM should provide that information to Magic Valley LLC as well as to the public. We advise the BLM to gather and use the best information to have an accurate scope of the land and its use.
Individual	DATA02 - 2 - Inadequate Analysis/Inaccurate Data	Without the knowledgeable public participation of Minidoka survivors, descendants and families, there will be significant material data gaps in fully understanding and assessing the harm or impacts created by the proposed project. It then will be an inadequate environmental analysis. The time is now to suspend, step back, and reassess the process.
Idaho Conservation League	DATA02 - 2 - Inadequate Analysis/Inaccurate Data	The scoping notice states that the majority of project infrastructure would be located within a series of mile wide corridors for turbines and power lines separated by roughly mile of undisturbed lands between the corridors. The total cumulative acreage within these corridors is 73,000 acres and the BLM is utilizing that figure to describe the scale of the project. The implication is that the swaths of public lands that are located between the developed corridors will not be affected by the project. However, the indirect effects on wildfire management, wildlife, livestock management and other resources will certainly include the areas between the corridors. The DEIS needs to describe the combined acreage both within and between the corridors to give the public a better understanding of the scale of the project. The DEIS should also note that not all lands within these mile corridors will be developed or altered. As mentioned previously, the DEIS also needs to acknowledge that the visual effects will also extend far beyond this area and provide an in-depth analysis of the viewsheds from the landscapes and communities surrounding the project area.
Individual	DATA03 - 3 - Suggest Additional Data Source	2. Full local residence assessments and approval must resolve the light, sound, view and traffic issues that are not yet defined.
Idaho Conservation League	DATA03 - 3 - Suggest Additional Data Source	We ask that the BLM and Magic Valley Energy/LS Power support the Idaho Department of Fish and Game with any wildlife surveys that the department deems necessary to adequately understand the impact of the Lava Ridge project on local wildlife populations and corridors. These studies can help to identify accurate understanding of wildlife movement throughout the project area as well as potential mitigation opportunities for affected wildlife species. We believe the project would benefit from at least one additional field season of data collection. The BLM and Magic Valley Energy/LS Power should consider extending the project timeline as needed to ensure sufficient data is collected to make an informed decision.
Individual	DATA03 - 3 - Suggest Additional Data Source	<p>For a definitive inventory of bats within the Lava Ridge Project area, I believe it will be necessary to consult directly with the small but active community of biologists that are conducting bat research in southern Idaho. This includes biologists with the BLM and Idaho Fish and Game in regions that cover the Snake River Plain (Shoshone and Idaho Falls Districts - BLM and Magic Valley, Southeast, and Upper Snake Regions - IDFG) as well as personnel from the National Park Service at Craters of the Moon National Monument, Minidoka National Wildlife Refuge, the Idaho National Laboratory, and BYU-Idaho. Direct consultation is necessary because much of the bat research completed in Idaho remains unpublished. These professionals can provide access to information that I believe will be critical for understanding bats in the project area and avoiding adverse impacts to them, such as:</p> <ul style="list-style-type: none">- NABat survey results in and around the proposed Lava Ridge Wind Project,- known lava tube caves and other potential roosting and foraging habitat in and around the proposed project area,- other local and regional acoustic survey and mist netting results,- regional mobile acoustic survey results,- best management practices for passive and active deployment of acoustic detectors to identify and quantify bat species in the project area,- local and regional hibernacula counts,

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		<div><div>- behavior at hibernacula and maternity roosts,</div><div>- probable migration corridors in the region,</div><div>- migratory behavior as seen recently through regional Motus stations,</div><div>- bat mortality at existing Idaho wind developments,</div><div>- potential effects of continuous motion, constant motion, and artificial lighting,</div><div>- avoidance and set-back/mitigation strategies for roosting habitat (lava tube caves, rifts, rim rock) and important foraging areas (ephemeral wetlands, historic canal systems, craters and caves)</div><div>- options for avoiding, reducing and/or mitigating bat fatalities (operational curtailment, smart curtailment, feathering turbine blades, ultrasonic deterrents, turbine placement and spacing)</div><div>I have had the privilege of working with all of these individuals and would be happy to provide names and contact information, as needed.</div></div>
Individual	DATA03 - 3 - Suggest Additional Data Source	I am certain that professional biologists with the BLM and Idaho Fish and Game will have the first-hand knowledge and assessment tools to inventory and characterize birds throughout the Lava Ridge Wind Project area and develop strategies to avoid, minimize and/or mitigate any unavoidable adverse effects. I believe that the efforts of citizen scientists affiliated with the Audubon Society may also provide important information on bird use of the proposed project area. Inventories created through annual Christmas Bird Counts, Winter Raptor Surveys, and the eBird community are a good source of information on bird sightings throughout the region. Data collected during Christmas Bird Counts is archived by the Idaho Bird Records Committee, which also moderates Idaho bird sightings on eBird, at their website, "Idaho Birds.net". The Winter Raptor Survey project is organized by the East Cascades Audubon Society. These ongoing surveys have been conducted since 2011 and involve monthly drives along designated routes, December through February. Data are archived and available for download at the project website, "ecaudubon.org".
Western Watersheds Project	DATA04 - 4 - Cumulative Effects Analysis	During a September 8, 2021, public scoping meeting, BLM was asked which version of the CEQ NEPA regulations would be used for the Projects NEPA analysis. A BLM employee responded that NEPA regulations had changed, and BLM would use the current regulation. We are concerned this may mean that BLM intends to use the 2020 Council on Environmental Quality (CEQ) NEPA regulations to prepare the Projects EIS. CEQs 2020 NEPA regulations omit previous requirements for indirect and cumulative impacts analysis. However, on October 7, 2021, CEQ published a Notice of Proposed Rulemaking which stated that it will be revising the 2020 NEPA regulations and that CEQ proposes to restore the prior definitions of effects analysis and reinstate analysis of indirect and cumulative impacts (CEQ 2021b at 55762-55769). But even without CEQs October 7, 2021, Notice of Proposed Rulemaking, the Projects EIS still must to analyze the indirect and cumulative impacts of the proposed action pursuant to Secretarial Order 3399, case law, and BLMs NEPA Handbook.
Individual	DATA04 - 4 - Cumulative Effects Analysis	What are the cumulative impacts to wildlife and public resources from the SWIP power line? What are the cumulative impacts to wildlife and public resources from China Mountain wind project, which would be facilitated by the SWIP powerline. BLM must consider these projects as connected and cumulative actions, as well as analyze their cumulative impacts.
National Park Service	DATA04 - 4 - Cumulative Effects Analysis	The combined, incremental effects of wind projects and other development in an area can result in the degradation of natural and cultural resources and values important to the NPS. In addition to the potential resource impacts from the proposed Lava Ridge Wind project as outlined above, the NPS is aware that several other solar and wind projects are proposed on BLM managed lands within the vicinity of Minidoka NHS and Craters of the Moon NM&P, as well as to the west near Hagerman Fossil Beds National Monument. Concern: The NPS is concerned about cumulative effects to the shared landscape and NPS resources and values from multiple proposed wind and solar projects and other developments. If projects are constructed to the south and northwest, in addition to the Lava Ridge project to the east, this could further erode the historic setting and integrity of the cultural landscape and could further industrialize the day and nighttime views. Recommendation: In order to accurately capture the potential impacts to these NPS units, the NPS recommends the BLM identify and analyze potential impacts from projects on surrounding lands that will contribute to the cumulative effects, including those reasonably foreseeable future projects for which the BLM has applications.
National Parks Conservation Association	DATA04 - 4 - Cumulative Effects Analysis	The EIS for the proposed Project must analyze all direct, indirect, and cumulative environmental impacts, and include a discussion of the means to mitigate adverse environmental impacts. 40 C.F.R. 1502.14 and 1502.16. Any analysis must include consideration of connected, cumulative and similar actions. Id., at 1508.25. Direct effects include those that are caused by the action and occur at the same time and place. 40 C.F.R. 1508.8(a). Indirect effects include effects that are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. 40 C.F.R. 1508.8(b). Cumulative effects are the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. 40 C.F.R. 1508.7. Effects are synonymous with impacts. 40 C.F.R. 1508.8.
National Parks Conservation Association	DATA04 - 4 - Cumulative Effects Analysis	BLM must analyze the direct, indirect and cumulative impacts from transmission development needed to support the proposed project and consider ways to avoid, minimize and mitigate impacts. The transmission lines associated with the project would also impact many of the same resources and values that would be impacted by the roads and infrastructure needed for wind energy generation, increasing the overall impact of the proposed project and our serious concerns about its effects.
U.S. Environmental Protection Agency	DATA04 - 4 - Cumulative Effects Analysis	<div>EPA guidance for Consideration of Cumulative Impacts in EPA Review of NEPA Documents is a reference framework available to BLM for the planned NEPA analysis to technically assess those effects.14 EPA recommends the analysis include an assessment of cumulative impacts on the following five key areas:</div> <div><div>1.Resources, if any, that are being cumulatively impacted;</div><div>2.Appropriate geographic area and the time over which the effects have occurred and will occur;</div><div>3.All past, present, and reasonably foreseeable future actions that have affected, are affecting, or will affect resources of concern;</div><div>4.A benchmark or baseline of existing environmental conditions; and</div><div>5.Scientifically defensible threshold levels.</div></div>
Idaho Conservation League	DATA04 - 4 - Cumulative Effects Analysis	The link from the project to the existing Idaho Power Midpoint substation or the permitted but not yet constructed Southwest Intertie Project - Northern Portion (SWIP-North) makes these connected actions. The DEIS should examine the environmental effects of connecting to the Midpoint Substation and SWIP North as two separate alternatives. The BLM should also examine the likelihood of other energy development projects in the area due to the intertie in the cumulative effects, reasonably foreseeable or connected actions section.
National Trust for Historic Preservation	DATA04 - 4 - Cumulative Effects Analysis	Although the timing of the NOI for this project is linked to the NEPA regulations issued under the Trump administration, which discourage the consideration of indirect and cumulative impacts, it is important to ensure that the BLM does fully consider those indirect and cumulative effects in this case. As you know, the Council on Environmental Quality has already issued a Notice of Proposed Rulemaking to reinstate the cumulative impacts requirement, and in any event, the Section 106 regulations explicitly require the consideration of cumulative effects. 36 C.F.R. 800.5(a)(1) (Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.)
Coalition to Protect America's National Parks	DATA04 - 4 - Cumulative Effects Analysis	<div>Comment # 5: The completion of SWIP Phase III (AKA SWIP North) in Idaho and the Proposed Action appear be connected actions under NEPA.</div> <div>Although the Record of Decision (ROD) for SWIP was issued in 1994, SWIP Phase III (AKA SWIP North), which is a 275-mile 500 kV transmission line between Midpoint Sub-station near Shoshone, Idaho and Robinson Summit in Nevada, has never been constructed.</div> <div>In December 2020, LS Power reported28 that SWIP North is permitted but seeking cost recovery (i.e., construction funding) and that the project is nearly construction ready and could be online as early as June 2024. The same report also indicated that SWIP North would provide a link to Idaho Power Company's interconnection queue; primarily wind, including a 1050 MW Lava Ridge wind project, being developed by [an] LS Power affiliate that is scheduled to be online in 2024. (Emphasis added.) It is unclear from that report if a Federal loan guarantee from DOE is needed to support financing of SWIP North; however, if it is, then one would expect DOE to conduct NEPA compliance as it did previously in 2010 for the Federal loan guarantee for SWIP South.</div> <div>In any case, the long delayed completion of SWIP North (or SWIP Phase III), first approved in 1994, and the proposed Lava Ridge Wind Project are both planned for completion in 2024; both are being developed by LS Power or an affiliate of LS Power; and both projects would be impractical and ineffective (i.e., useless) without the other. In fact, the map below that was included in LS Powers December 2020 report geographically illustrates the dependency of one projects existence upon the completion of the other, and vice versa.</div> <div>Last but not least, the most recent (July 2021) U.S. Geological Survey (USGS) interactive wind turbine database map29 for Idaho shows there are no existing wind turbines in the immediate vicinity of the Twin Falls-Midpoint Substation-Shoshone area. In other words, there is no apparent current demand for extending SWIP into Idaho at this time.</div> <div>Completing the Idaho leg of an interstate high voltage transmission line that terminates in rural Idaho nearly three decades after it was approved, makes no sense unless and until there will be a major energy generation facility near the same terminus. As a result, SWIP North and the Lava Ridge Wind Project appear</div> <div>to be connected actions under NEPA. As described in BLM Permanent Instruction Memorandum No. 2018-02330:</div> <div>Connected actions are those proposed Federal actions that are closely related and should be discussed in the same NEPA document (40 CFR 1508.25 (a)(1)). Proposed actions are connected if they automatically trigger other actions that may require an environmental impact statement; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(1)). (Emphasis added.)</div>

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		<p>If the connected action is also a proposed BLM action, we recommend that you include both actions as aspects of a broader proposal (40 CFR 1508.23), analyzed in a single NEPA document. You may either construct an integrated purpose and need statement for both your proposed action and the connected action, or you may present separate purpose and need statements for your proposed action and the connected action. Regardless of the structure of the purpose and need statement(s), you must develop alternatives and mitigation measures for both actions (40 CFR 1508.25(b)), and analyze the direct, indirect, and cumulative effects of both actions (40 CFR 1508.25(c)). (Emphasis added.)</p> <p>We recommend that the DEIS include an analysis of SWIP North (Phase III) and the Lava Ridge Wind Project as connected actions under NEPA. If either action cannot or will not proceed without the other, then they would be connected under NEPA and should be evaluated accordingly in the DEIS.</p>
Individual	DECI01 - 1 - General	Will allowing this project open the door for similar projects? It has come to our attention that several other companies have submitted proposals for wind and solar projects that would essentially cover Hundreds of thousands of acres of Idaho's public land from Burley to Gooding and south of Twin Falls toward Nevada.
National Park Service	DECI01 - 1 - General	The complexity and precedent-setting nature of the proposed Lava Ridge Wind Project creates complex challenges beyond a typical multi-agency NEPA process. For cooperating agencies and consulting parties to effectively provide input, the NPS recommends several adjustments to the NEPA process for this project. The NPS strongly encourages BLM to identify a preferred alternative in the draft EIS as this will allow Cooperating Agencies, Consulting Parties, stakeholders, and the public to engage more effectively in the compliance processes. The NPS requests that the BLM publish a project integration schedule in the DEIS to clarify the timing, sequencing and interrelationships of ongoing compliance and regulatory processes. The project integration schedule would include timing-related aspects for preparing and finalizing the DEIS, FEIS/ROD, Administrative Appeals, consultation under Section 106 of the National Historic Preservation Act, FAA permitting, the Plan of Development and similar. The Lava Ridge Wind project is extremely complex. The BLM would be able to disclose how the various pieces of the project are interrelated and provide real-time updates to the project sequence. This additional layer of transparency and communication would contribute towards the resolution of the projects adverse effects. The NPS requests that the BLM provide draft documents to Consulting Parties and Cooperating Agencies for concurrent review and allow for longer review periods in the NEPA schedule.
National Parks Conservation Association	DECI01 - 1 - General	Given the serious impacts the project, as proposed, would have on Minidoka National Historical Site and Craters of the Moon Monument and Preserve as well as the environmental justice communities associated with the cultural and historic sites in the area, we recommend that the BLM pause the planning process or select and No Action Alternative and study ways to permanently protect the sites.
Idaho Conservation League	DECI01 - 1 - General	<p>We are encouraged by efforts so far to co-locate facilities within the Western Energy Corridor. We appreciate the co-location of project infrastructure so that roads and transmission lines will parallel existing facilities to the extent practicable.</p> <p>A number of factors such as tower to tower span lengths (ranging from approximately 1,000 to 1,600 feet) and tower location within string buffers (within a mile wide siting corridor) will be determined in the latter stages of permitting. These micro adjustments may or may not sufficiently respond to issues raised in the NEPA process. These issues include effects to recreational amenities such as parking areas, trailheads, trails, and hunting camps, cultural resources, grave sites, rattlesnake hibernaculum, rare plant habitat, among others. Because some of these microsites adjustments may not be made until after a Record of Decision is issued, the BLM should consider addressing these in a Supplemental Environmental Assessment with additional opportunities for public review.</p>
Star Lake Grazing Permittees	DECI03 - 3 - BLM RMP Plans	<p>(2)Assuming a viability and feasible wind resource potential in the Star Lake Allotment, the Monument Resource Management Plan does not authorize Wind Projects, though the 2015 Idaho ROD-ARMPA may subject to conformance with other management direction therein.</p> <p>All management actions must conform to the applicable Land Use Plan. 43 C.F.R. 1610.5-3(a) (10-1-2019 Edition) states that [a]ll future resource management authorizations and actions shall conform to the approved plan. See also Federal Land Policy and Management Act, 43 U.S.C. 1712. 43 C.F.R. 2802.11(b)(1) (10-1-2019 Edition) adds further direction, stating that [w]hen determining which lands may be suitable for right-of-way corridors or designated leasing areas, the factors the BLM considers include, but are not limited to, the following: (1) Federal, state, and local land use plans . See 43 C.F.R. 2801.2(c), 2802.10(a)(3), 2802.11(a), 2804.35(a)(4), 2809.19(a) (10-1-2019 Edition); see also 43 C.F.R. 2801.5(b) (10-1-2019 Edition) (wherein Designated leasing area means a parcel of land with specific boundaries identified by the BLM land use planning process as being a preferred location for solar or wind energy development that may be offered competitively, and wherein Screening criteria for solar and wind energy development refers to the policies and procedures that the BLM uses to prioritize how it processes solar and wind energy development right-of-way applications to facilitate the environmentally responsible development of such facilities through the consideration of resource conflicts, land use plans, and applicable statutory and regulatory requirements. Applications for projects with lesser resource conflicts are anticipated to be less costly and time-consuming for the BLM to process and will be prioritized over those with greater resource conflicts).</p> <p>Here, under information and belief, the applicable land use plan is the Monument Resource Management Plan dated January 1986 (Monument RMP), as amended by the following amendments:</p> <p>(1)Record of Decision dated August 20, 2003, relating to Land Tenure Adjustment and Areas of Critical Environmental Concern (2003 ROD-Land Tenure);</p> <p>(2)Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region, including the Greater Sage-Grouse Sub-Regions of Idaho and S.W. Montana, Nevada and N.E. California, Oregon, and Utah dated September 15, 2015 (2015 ROD-ARMPA);</p> <p>(3)Attachment I to the 2015 ROD-ARMPA dated September 15, 2015, relating to the Idaho and S.W. Montana Greater Sage-Grouse Resource Management Plan Amendment (2015 Idaho ROD-ARMPA); and,</p> <p>(4)Idaho Greater Sage-Grouse Record of Decision and Approved Resource Management Plan Amendment dated March 14, 2019 (2019 Idaho ROD- ARMPA), as reaffirmed by the Idaho Record of Decision for the Greater Sage-Grouse Supplemental Environmental Impact Statement dated December 30, 2020 (2020 Idaho ROD-SEIS).1Permittees use the words under information and belief because we welcome you to confirm the status of the applicable land use plan. We want to be certain as to the controlling / applicable land use plan covering the public lands within the Star Lake Allotment. We are not 100% certain because we are informed that the 2019 Idaho ROD-ARMPA was enjoined from implementation by W. Watersheds Project v. Schneider, 417 F. Supp. 3d 1319 (D. Idaho 2019). However, such court decision was issued before issuance of the 2020 Idaho ROD-SEIS, and we read the 2020 Idaho ROD-SEIS as intending to correct any mistakes in the 2019 Idaho ROD-ARMPA and to reaffirm the 2019 Idaho ROD-ARMPA. It is possible this uncertainty may have been a topic of discussion between BLM and Magic Valley Energy in the first meeting as required by 43 C.F.R. 2804.12(b)(4)(i) (10-1-2019 Edition), wherein at the first meeting between an applicant and BLM requires a discussion of the status of BLM land use planning for the lands involved .</p> <p>Assuming the applicable land use plan is the Monument RMP, as amended only by the 2003 ROD-Land Tenure, 2015 ROD-ARMPA, and the 2015 Idaho ROD-ARMPA, then the Permittees don't find any explicit management direction for wind energy in the Monument RMP.</p> <p>1 We do not find that the applicable land use plan covering the Star Lake Allotment was amended by the 2005 ROD-Wind. The 2005 ROD-Wind amended several land use plans related to wind energy across the 11-State study area of the 2005 FPEIS-Wind including within Idaho.</p> <p>In fact, as to Idaho, the 2005 ROD-Wind amended seven (7) land use plans, though one of them was not the Monument RMP. See 2005 ROD-Wind, Appendix B, at pages B-3 to B-4. Based thereon, the Permittees do not find the 2005 ROD-Wind amended the Monument RMP or otherwise provides any land use planning direction relative to the intended Project. See 2005 ROD-Wind, Appendix B, at pages B-3 to B-4. However, with that said, it is compelling to note that the 2005 ROD-Wind, Attachment A, at page A-2, relating to BLM Wind Energy Development Program Policies and Best Management Practices included a policy statement that [t]o the extent possible, wind energy projects shall be developed in a manner that will not prevent other land uses, including minerals extraction, livestock grazing, recreational use, and other ROW uses (emphasis supplied). See also 2005 FPEIS-Wind, Volume 1, pages 2-5, 4-33.</p> <p>However, the 2015 Idaho ROD-ARMPA includes in Table 2-1 a Summary of Allocation Decisions by GRSG Habitat Management Areas, noting the following as to Wind Resources:</p> <p>2015 Idaho ROD-ARMPA, Table 2-1, at page 2-3; see also 2015 Idaho ROD-ARMPA, Table 1- 6, at page 1-11. This would indicate that the areas within a General Habitat Management Area or GHMA are open for Wind Energy development subject to conformance with other provisions in the applicable land use plan, including the 2015 Idaho ROD-ARMPA.</p> <p>Here, the 2015 Idaho ROD-ARMPA discloses that the public lands within the Star Lake Allotment are within a GHMA (which is encircled in yellow), though the Permittees request from BLM a site-specific map of the sage-grouse habitat areas within the Star Lake Allotment. The 2015 Idaho ROD-ARMPA illustrates the following:</p> <p>2015 Idaho ROD-ARMPA, Figure 1-2, at page 1-3.</p> <p>Assuming the Star Lake Allotment is within a GHMA, the Permittees note several management directions associated with Wind Energy development within the 2015 Idaho ROD- ARMPA which must be followed by any intended Project, as follows:</p> <p>Section 2.1.1 -- Special Status Species: Goal SSS 1, 2, 3, 4, 5; Objective SSS 1, 2, 3, 4, 5; MD SSS 27 (Anthropogenic Disturbance); and</p> <p>Section 2.2.7 Renewable Energy (Wind and Solar): MD RE 1 (wherein it is stated that GHMA (Idaho): Designate and manage GHMA as open for wind and solar testing and development and nuclear and hydropower development subject to RDFs and buffers.)</p> <p>Any NEPA process should assess all applicable management direction relative to the intended Project as to the Star Lake Allotment, as well as ensure any authorization documents are in conformity with such management direction as per 43 C.F.R. 1610.5-3(a) (10-1-2019 Edition).</p>
Star Lake Grazing Permittees	DECI03 - 3 - BLM RMP Plans	<p>In addition, as noted, MD RE 1 in the 2015 Idaho ROD-ARMPA requires conformance to the buffers and RDFs even in General Habitat Management Areas, like those that would appear to be within the Star Lake Allotment. The buffers are identified in the 2015 Idaho ROD-ARMPA at Appendix B. See Attachment #6 (which is attached hereto). While these buffers speak for themselves, it is apparent that the buffers implicate distances / buffers:</p> <p>from roads (which must be 3.1 miles from leks),</p> <p>from infrastructure related to energy development (which must be 2.0 miles from leks),</p> <p>from tall structures (which must be 3.1 miles from leks),</p> <p>from surface disturbance that involve altering or removing natural vegetation (which must be 3.1 miles from leks), and</p>

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		noise and related disruptive activities that do not result in habitat loss (which must be at least 0.25 miles from leks). See 2015 Idaho ROD-ARMPA at page B-1. These buffers would appear to reflect some significant challenges in the placement / location of the intended Wind Structures, depending on the location of active or occupied leks within the Star Lake Allotment. See Notice at PDF pages 5-6. The 2015 Idaho ROD-ARMPA, Appendix B, at page B-1, prescribes that: [i]n determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.
Idaho Office of Energy and Mineral Resources	DECI03 - 3 - BLM RMP Plans	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. -Impact of construction and operations and maintenance on the existing resource management plan (RMP).
National Parks Conservation Association	DECI03 - 3 - BLM RMP Plans	The 1986 Monument Resource Management Plan (RMP) is one of the most outdated RMPs in the country and states, More detailed management plans, called activity plans, will be prepared to deal with areas where a greater level of detail is required (pg 26). The viewsheds of these two national park units require more detailed management plans.
Idaho Conservation League	DECI03 - 3 - BLM RMP Plans	The BLMs 1986 Monument Resource Management Plan is one of the oldest and most outdated plans in the nation. While there have been some issue specific amendments regarding Sage-grouse, there is an overall lack of direction and insufficient consideration of modern natural resource issues such as wildfires, noxious weeds, sensitive species, water quality, water quantity, habitat fragmentation, recreation, rural economics, livestock management, cultural protections, climate change, light pollution, among others. The outdated nature of the Resource Management Plan places a higher burden on the NEPA analysis to carefully consider the environmental impacts of the proposed action and alternatives. Where the Monument does provide some management direction for cultural resources, we have highlighted those sections in later sections of our comments. We also believe that there is a need for the BLM to provide additional amendments to Resource Management Plans following the analysis of this project in order to address concerns raised through this process.
Idaho Conservation League	DECI03 - 3 - BLM RMP Plans	The Monument RMP calls for more detailed management plans or activity plans when the need arises. As part of mitigation for this project, the BLM should complete an activity plan focused on protecting the values of the adjacent Minidoka National Historic Site:
Idaho Conservation League	DECI03 - 3 - BLM RMP Plans	Based on the public comments regarding visual effects to the Minidoka National Historic Site, we recommend that the BLM consider adding a viewshed buffer around Minidoka based on the Visual Resource Management classification system as part of a Resource Management Plan amendment. The exact distance could be based on discussions between members of the Japanese American community, the BLM and Magic Valley Energy/LS Power. There may also be sites of cultural significance to Shoshone-Bannock and Shoshone-Paiute tribal members that could be addressed through similar means.
Coalition to Protect America's National Parks	DECI03 - 3 - BLM RMP Plans	Although the RMP provided that [g]enerally, public lands may be considered for the installation of public utilities; it did not specifically consider the possible future construction of a major interstate high voltage transmission line (SWIP) or the possible future construction of a massive wind farm project (Lava Ridge). Given such gaps in the RMPs vision of future use and development, it would be nonsense if BLM were to say now that the massive wind farm that has been proposed now is somehow consistent with the general reference to public utilities in the 1986 RMP. As a result, BLM should provide a reasonable explanation in the DEIS as to the planning basis for accepting MVEs grant application to develop a massive wind farm at such an highly impactful location and thus move forward with an EIS.
National Park Service	DECI04 - 4 - National Park Service	Recommendation: The NPS requests that the BLM continue to consult with both the NPS and stakeholders representing the Japanese American community to fully understand national significance of Minidoka NHS, and how best to preserve the historic integrity of the NHS. The NPS requests the analysis of adverse effects explicitly address the experience of remoteness, isolation, abandonment, and injustice for Japanese Americans incarcerated at the site, and recommend mitigations to avoid or minimize such impacts to the visitor and survivor experience from the construction and operation of the project.
National Park Service	DECI04 - 4 - National Park Service	The NPS requests that BLM continue consultation with the NPS National Trails Office regarding effects to the High Potential Sites and Segments of the Oregon NHT, and how the visitors experience of the historic sites may be altered.
National Park Service	DECI04 - 4 - National Park Service	The NPS appreciates the early coordination already extended by the BLM in response to this vital concern and requests ongoing coordination to avoid or minimize night sky impacts.
National Park Service	DECI04 - 4 - National Park Service	Recommendation: The NPS requests ongoing coordination to avoid or minimize impacts to wilderness character for designated and proposed wilderness areas. The Wilderness Stewardship Division of the NPS is available to share many resources and experiences from other projects.
National Park Service	DECI04 - 4 - National Park Service	The NPS proposes to host a site visit to Minidoka NHS for the BLM State Director to meet with incarceration survivors and the Regional Director of the NPS and the park superintendent. This visit would be scheduled at a date and time that would be mutually convenient for all parties. The NPS proposes to coordinate a joint BLM and NPS briefing with each agency's respective Assistant Secretaries following conclusion of the DEIS Scoping comment period and before the draft EIS is released.
Individual	DECI05 - 5 - Section 106 Consultation	I am writing to express my interest in being a consulting party in regards to the Lava Ridge Wind Farm project.
Individual	DECI05 - 5 - Section 106 Consultation	I'm writing to ask BLM TO BE INCLUDED AS A CONSULTING PARTY in this project as I'm concerned about the potential impact on the Minidoka park site.
Portland Japanese American Citizens League	DECI05 - 5 - Section 106 Consultation	I would like to ask the BLM that the Portland Japanese American Citizens League (JACL) be added as a consulting party for Section 106 compliance. I am part of the Portland JACL in Oregon, and I am also a descendant of Japanese Americans who were incarcerated at the Minidoka camp during WWII. My family endured incarceration and its intergenerational impacts. The Minidoka National Historic Site holds significance to not only my family but to the greater Japanese American community. The historic site remains as a place for family pilgrimages, community event space and educational center for future generations. Although green energy is vital to our society, I'd ask that the BLM consider development in an area that is not of historic significance.
Japanese American Citizens League Alaska Chapter	DECI05 - 5 - Section 106 Consultation	The Alaska Chapter of the Japanese American Citizens League requests to be included as a consulting party on the issue of the wind farm project proposed within view of the Minidoka National Historic Site. We have members who were incarcerated at Minidoka, were born there, or have blood ties to those who were. We are firm in our opposition to such an encroachment on ground set aside to preserve and honor the memories of thousands.
National Park Service	DECI05 - 5 - Section 106 Consultation	Similarly, the NPS recommends consulting with Japanese American stakeholder organizations affiliated with Minidoka NHS to identify ethnographic resources and possible effects from the project.
National Parks Conservation Association	DECI05 - 5 - Section 106 Consultation	We urge BLM to meet with any group or individual requesting consultation under the National Historic Preservation Act (NHPA) Section 106 process, including Friends of Minidoka, the Minidoka Pilgrimage Committee, and any other group or individual with connections to Minidoka, to ensure they weigh in and understand any potential harms to the viewshed and associated values of Minidoka. We request that BLM engage in nation-to-nation consultation with the tribes connected to this area (Shoshone- Bannock Tribes and any other affiliated tribes) to ensure they weigh in and understand any harms to sacred viewsheds.
Individual	DECI05 - 5 - Section 106 Consultation	Please add us as a Consulting Party on this project. We are an administrative unit of the Minidoka National Historic Site, and have a direct and intimate interest in the handling of this application.
Oregon Physicians for Social Responsibility	DECI05 - 5 - Section 106 Consultation	Oregon Physicians for Social Responsibility (PSR) requests to be a Consulting Party for section 106 compliance on the issue of the siting of Magic Valley Energy's Lava Ridge Wind Project.
Individual	DECI05 - 5 - Section 106 Consultation	Please include me as a consulting party for any Section 106 consultations that happen regarding this project.
Individual	DECI05 - 5 - Section 106 Consultation	It would be wise if the BLM included the National Park Service, Friends of Minidoka, and The Minidoka Pilgrimage Committee as official consulting parties during the NEPA process as well as engage in nation-to-nation consulting with the Shoshone Bannock and all Native American tribes connected to this region.
Individual	DECI05 - 5 - Section 106 Consultation	I would like to be included as a consulting part.
Japanese American Confinement Sites Consortium	DECI05 - 5 - Section 106 Consultation	JACSC also requests the close consultation of the National Park Service and Advisory Council on Historic Preservation throughout the entire EIS process as subject matter experts on historic preservation and on Minidoka and the wartime incarceration of Japanese Americans.
Individual	DECI05 - 5 - Section 106 Consultation	Direct and indirect impacts will be unavoidable within and around the Lava Ridge Wind Project area and must be assessed through established methodologies under the National Historic Preservation Act, National Environmental Policy Act, and BLM policy. This cannot be accomplished without direct and meaningful consultation with the individuals and groups that have intimate knowledge and deep personal connections to cultural resources and values within the proposed project area. At a minimum, the following stakeholders and interested parties should be invited to participate in consultation: Friends of Minidoka National Historic Site, historical societies and preservation commissions in Jerome, Lincoln, and Twin Falls counties, Idaho Archaeological Society, Idaho State Historic Preservation Office, Shoshone-Bannock Tribes, and Shoshone-Paiute Tribes.
Coalition to Protect America's National Parks	DECI05 - 5 - Section 106 Consultation	Comment # 11: The potential for significant adverse effects to visual resources at National Register- listed Minidoka NHS and on the surrounding agricultural landscape are of utmost concern during the Section 106 consultation and evaluation process. The agencies, the Idaho SHPO, and the Nikkei community should formally request the Advisory Council on Historic Preservation (ACHP) to actively early participate in the Section 106 consultation process.

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		<p>While comments # 7 and 8 above focus on analyzing visual impacts under the NEPA review process, this comment (#11) focuses on the Section 106 consultation process and assessment of adverse effects under the NHPA.</p> <p>As discussed previously, the number and size of wind turbines proposed at Lava Ridge by MVE will dominate the landscape and overwhelm the scenic vistas immediately north and northeast of Minidoka National Historic Site, which is listed on the National Register of Historic Places. As a result, the adverse effects of the Proposed Action are essentially unavoidable and unmitigable. BLM should not pretend otherwise. Key questions during the Section 106 consultation process include:</p> <p>Will the proposed undertaking directly or indirectly alter characteristics of Minidoka NHS (or the potentially eligible rural historic landscape encompassing the original 33,000 acre footprint of the camp) that qualify (or potentially qualifies) the site (s) for inclusion in the National Register?</p> <p>Will the Proposed Action diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association?</p> <p>We believe the answers to these questions are obvious, based on the size and extent of the proposed wind farm illustrated on the several site maps included in this letter. As a result, early participation by ACHP in the consultation process is not only beneficial, it is essential!</p> <p>As described on ACHPs Office of Federal Agency Programs (OFAP) website³⁸, a project may have substantial adverse effects or if important policy or procedural questions are raised, the ACHP may elect to participate in the consultation process. OFAP manages the ACHPs participation in Section 106 consultation and provides guidance, advice, and technical assistance to federal agencies and other participants in the Section 106 process. When historic properties will be adversely affected by a federal undertaking, the review usually concludes with the execution of a legally binding agreement that outlines how the federal agency will resolve those effects. In rare circumstances where agreement cannot be reached, the ACHP issues advisory comments to the head of the federal agency who must then consider them in making a final decision about whether the project will proceed.</p> <p>We urge BLM, NPS, the Idaho SHPO and the Nikkei community to formally request the early participation of the ACHP in the Section 106 consultation process consistent with ACHP regulations in 36 CFR Part 80039. For example, 36 CFR Section 800.2(b)(1) addresses Council entry into the section 106 process, as follows: When the Council determines that its involvement is necessary to ensure that the purposes of section 106 and the act are met, the Council may enter the section 106 process. Criteria guiding Council decisions to enter the section 106 process are found in Appendix A to this part. The Council will document that the criteria have been met and notify the parties to the section 106 process as required by this part.</p> <p>In addition, Appendix A, section (b), states, in part: The Council may choose to exercise its authorities under the section 106 regulations to participate in an individual project pursuant to the following criteria. The criteria listed under section (c) for ACHP involvement includes when an undertaking: (1) Has substantial impacts on important historic properties. (2) Presents important questions of policy or interpretation. (3) Has the potential for presenting procedural problems. This may include cases with substantial public controversy that is related to historic preservation issues; with disputes among or about consulting parties which the Council's involvement could help resolve; [or] that are involved or likely to be involved in litigation on the basis of section 106.</p> <p>In this case, more than one, if not all, of the criteria have been or will be met. Therefore, ACHP involvement throughout the Section 106 consultation process is appropriate; and, we believe, essential to successful project management that reduces the likelihood of costly compensatory mitigation and/or litigation.</p>
Japanese American Exclusion Memorial Association	DECI05 - 5 - Section 106 Consultation	<p>YES, Include "BLM to be included as a 'Consulting Party', "for Section 106 compliance!.</p> <p>My position here is from my board membership on the Japanese-American Exclusion Memorial Association, and extending further through the Bainbridge Island Japanese-American Community organization.</p>
U.S. Environmental Protection Agency	DECI06 - 6 - Section 7 Consultation / BA	Indicate how the project will meet all requirements under the Endangered Species Act (ESA), including consultation with the US Fish and Wildlife Service under Section 7 of the ESA and, if applicable, the National Marine Fisheries Service. It will also be important to coordinate with the Idaho Department of Fish and Game to define practices that will be protective of biota and habitat during implementation of the project.
U.S. Environmental Protection Agency	DECI06 - 6 - Section 7 Consultation / BA	If the Applicant plans to obtain an Eagle Take Permit from the USFWS, include the status of that permit consultation process in the DEIS
U.S. Environmental Protection Agency	DECI07 - 7 - Other Agency Consultation and Coordination	As the project will likely require a variety of other authorizations and permits and not just the right-of- way grant from BLM, EPA recommends that the DEIS include a list of all permits/authorizations that the project facilities will need, what activity and/or facility is regulated by the permit or authorization, entities that will issue each permit and authorization, when each will expire, and conditions to assure protection of human health and the environment. Such information, presented in a consolidated fashion, will assist agency decision-makers and the public in evaluating the proposed projects impacts and mitigation required to address those impacts.
Individual	DECI08 - 8 - Relationship to Policies, Plans, and Programs	<p>For the record, let me emphatically state that I am not only an ardent supporter of expanding renewable energy sources for this country, I am also an equally ardent supporter of the Endangered Species Act and sage grouse conservation. It is not lost on me that during the Obama Administration, BLM adopted and actively promoted its Smart from the Start renewable energy policy that was designed to steer renewable projects away from high conflict sites on public lands and redirect them to low conflict sites to facilitate their construction. Steering Lava Ridge away from sage grouse habitat is Smart From the Start.</p> <p>By contrast, redirecting the project to an alternative site that invades the historic footprint of Minidoka and destroys the viewshed of the Historic Site is the very antithesis of Smart from the Start, and guarantees nothing less than an all-out legal battle with an angered and disappointed Japanese American community along with our partners.</p>
National Park Service	DECI08 - 8 - Relationship to Policies, Plans, and Programs	The NPS requests that the BLM clarify whether and how Secretarial Order 3399, Department- Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision- Making Process, applies to the project. In particular, the NPS underscores the importance of enhancing opportunities for Tribal and environmental justice community engagement with the NEPA and decision-making process (Secretarial Order 3399, April 16, 2021).
Friends of Minidoka	DECI08 - 8 - Relationship to Policies, Plans, and Programs	As expressed through multiple Executive Orders and policy statements in early 2021, President Biden stated his goals for clean energy and racial and environmental justice, along with process requirements to engage stakeholders in the process to ensure that Administration achieves both goals. The purpose of early engagement is to ensure that the renewable energy proposals are sited in locations that avoid harming environmental justice communities, natural, cultural, and historic resources and other important goals. By requiring early engagement in the planning process, the Administration can achieve both its renewable energy and environmental justice goals by using a smart from the start approach for siting renewable energy projects.
Friends of Minidoka	DECI08 - 8 - Relationship to Policies, Plans, and Programs	<p>President Biden made his Administration's policies and priorities clear starting on day one. On January 20, 2021, President Biden signed Executive Order 13985 entitled Advancing Racial Equity and Support for Underserved Communities through the Federal Government. In calling for a whole-of-government equity agenda, President Biden stated an Administration goal to advance racial equity: for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government. Because advancing equity requires a systematic approach to embedding fairness indecision-making processes, executive departments and agencies (agencies) must recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity. The Racial Justice E.O. defines equity to include the Asian American Pacific Island (AAPI) community. Because the Japanese American community has received unequal treatment by the government and BLM is an agency in the federal government, this E.O. applies to BLM and its land management planning. In carrying out the Presidents Racial Justice E.O., Secretary Haaland announced a Department of the Interior budget initiative in the Presidents Fiscal Year 2022 budget request. Entitled 1 Promoting Racial Justice and Equity for Underserved Communities, the Departments FY 2022 discretionary request will embed environmental justice and racial equity goals into programs across the Department, with discrete investments in key areas. For example, the request includes an additional \$20 million to expand access to the over 70 national park units that preserve and tell the story of historically underrepresented and marginalized groups. The DOIs \$20 million racial justice initiative includes a proposed \$210,000 base budget funding increase for Minidoka to support operations and maintenance of the visitor center in order to provide quality visitor services The new visitor center, dedicated in 2020, is a significant part of the sites visitor experience. We are grateful for the Secretary's support for additional staffing for 2 Minidoka to ensure that the stories of people of color are told. On January 27, 2021, President Biden issued Executive Order 14008, entitled Tackling the Climate Crisis at Home and Abroad. The Climate Crisis E.O. states the goals of the Administration to reduce climate pollution and deliver environmental justice.³ The E.O. also states that: [s]uccessfully meeting these challenges will require the Federal Government to pursue such a coordinated approach from planning to implementation, coupled with substantive engagement by stakeholders, including State, local, and Tribal governments. Emphases added. To carry out this guidance from the President, Secretary Haaland issued Secretarial Order 3399, entitled a Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process. The Secretary's Order clearly requires BLM to engage with stakeholders early in the planning process, before a decision to prepare an environmental impact statement: "Bureaus/Offices will proactively begin consultation with potentially impacted Tribes, both those currently in the proposed area and those with a historic presence, as well as engage potentially impacted environmental justice communities early in the project planning process. Early in the project planning process includes when a Bureau/Office has enough information on a proposed action to determine that an environmental assessment or an environmental impact statement will be prepared." Section 5(C) Emphases added. In addition to Executive and Secretarial Orders, the Biden Administration stated its goals through its American Jobs Plan released in March 2021. In the section entitled Spur jobs modernizing power generation and delivering clean electricity, the Administration outlined several initiatives and stated: [a]ll of this will be done while ensuring those facilities meet robust and rigorous standards for worker, public, and environmental safety as well as environmental justice and all while moving toward 100 percent carbon-pollution free power by 2035. Emphases added.</p>
Friends of Minidoka	DECI08 - 8 - Relationship to Policies, Plans, and Programs	In addition to specific Acts of Congress, the Lava Ridge proposal contravenes over 45 years of official U.S. Government policy related to the incarceration as expressed by all three branches of our government including: Presidents of both parties; multiple Congresses; and the U.S. Supreme Court. We have included a camp preservation timeline at the end of this letter. Starting in 1976 with President Gerald Ford, every U.S. President has taken official actions acknowledging that the incarceration was wrong. As a corollary, the executive branch and every President since President George H.W. Bush has taken action to preserve and interpret sites of incarceration. The U.S. Congress, through many different acts, such as the Civil Liberties Act of 1988, has passed legislation to acknowledge the injustice and ensure that this story is not forgotten. In 2018, the U.S. Supreme Court ruled that its World War II-era Japanese American cases were wrongly decided.
National Parks Conservation Association	DECI08 - 8 - Relationship to Policies, Plans, and Programs	The Wind PEIS included Best Management Practices (BMPs) that would be required components of a wind project proposal and application process. If BLM decides to proceed with environmental review and permitting of the proposed project, the agency should include the Wind PEIS BMPs in the NEPA analysis and explain how the proposed project would conform to each.
U.S. Environmental Protection Agency	DECI08 - 8 - Relationship to Policies, Plans, and Programs	Executive Order 13112, Invasive Species mandates that federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species cause. Executive Order 13112 also calls for the restoration of native plants and tree species.

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U.S. Environmental Protection Agency	DECI08 - 8 - Relationship to Policies, Plans, and Programs	Discuss how the proposed action will support or conflict with the objectives of other federal, state, tribal or local land use plans, policies and controls in the analysis area and vicinity;
U.S. Environmental Protection Agency	DECI08 - 8 - Relationship to Policies, Plans, and Programs	The term land use plans includes all types of formally adopted documents for land use planning, conservation, zoning, and related regulatory requirements. Proposed plans not yet developed should also be addressed if they have been formally proposed by the appropriate government body in a written form.15 EPA notes there are sensitive resources in the area with management plans that may include restrictions or coordination requirements which may impact the project. They include the Minidoka National Historic Site, Wilson Butte Cave, Craters of the Moon National Monument and Preserve, Snake River Plain Aquifer, and others.
Idaho Conservation League	DECI08 - 8 - Relationship to Policies, Plans, and Programs	The DEIS should also describe how the development of the Lava Ridge project is consistent with County Comprehensive Plans or could be designed to be consistent with them. We believe that the NEPA process should adequately disclose any potential discrepancies and that alternatives be developed to help prevent and mitigate these conflicts.
Japanese American Confinement Sites Consortium	DECI08 - 8 - Relationship to Policies, Plans, and Programs	JACSC encourages the BLM to follow guidance from President Biden, via Executive Order 13985, for the whole of our Government to advance racial justice. The Presidents Order states: It is therefore the policy of my Administration that the Federal Government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government. JACSC encourages the BLM to follow guidance from Executive Order 14008 Tackling the Climate Crisis at Home and Abroad which requires the Secretary of the Interior to consult with interested parties in her review of siting and permitting processes for renewable energy on public lands. (Sec. 207). JACSC encourages the BLM to follow Department of Interior policy guidance, as directed in Secretarial Order 3399, which outlines a Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process. S.O. 3399 directs: Bureaus/Offices will proactively begin consultation with potentially impacted Tribes, both those currently in the proposed area and those with a historic presence, as well as engage potentially impacted environmental justice communities early in the project planning process. Early in the project planning process includes when a Bureau/Office has enough information on a proposed action to determine that an environmental assessment or an environmental impact statement will be prepared.
Individual	DECI08 - 8 - Relationship to Policies, Plans, and Programs	Comprehensive Plans prepared for both Jerome and Lincoln counties highlight the importance and need for preservation of historic, archaeological, and natural resources as well as the recreation values associated with public lands.
Coalition to Protect America's National Parks	DECI08 - 8 - Relationship to Policies, Plans, and Programs	J. Executive Order 14008 of January 27, 2021: Tackling the Climate Crisis at Home and Abroad18 EO section 207, Renewable Energy on Public Lands and in Offshore Waters, directs the Secretary of the Interior to consult with interested parties in her review of siting and permitting processes for renewable energy on public lands. Obviously, in this case the Nikkei are an interested party who must be consulted.
Shoshone-Bannock Tribes	DECI08 - 8 - Relationship to Policies, Plans, and Programs	The Tribes stress the importance of initiating efforts to restore the Snake River system and affected unoccupied lands to a natural condition. The Shoshone-Bannock Tribes Policy for Management of the Snake River Basin Resources states: The Shoshone Bannock Tribes (Tribes) will pursue, promote, and where necessary, initiate efforts to restore the Snake River systems and affected unoccupied lands to a natural condition. This includes the restoration of component resources to conditions which most closely represents the ecological features associated with a natural riverine ecosystem. In addition, the Tribes will work to ensure the protection, preservation, and where appropriate-the enhancement of Rights reserved by the Tribes under the Fort Bridger Treaty of 1868 (Treaty) and any inherent aboriginal rights. The proposed project has the potential to impact a large landscape that is currently home to a myriad of native assemblages of species. While our policy does recognize that anthropogenic modifications are the current paradigm, large-scale projects should not impact future generations of Tribal members' opportunities to enjoy the natural view shed, gather resources and continue traditional cultural practices. Each project must be objectively evaluated and those noted impacts must be mitigated equitably for the Tribes.
Twin Falls Historic Preservation Commission	DECI09 - 9 - Agency Planning Regulations or Federal Laws	As stated, the Lava Ridge Wind Energy Project would affect a variety of historical sites in Twin Falls County and the surrounding area. Viewsheds add to the aesthetics of a historic property and are deserving of the protections outlined in several preservation acts. For instance, the National Historic Preservation Act passed by Congress in 1966 to establish standards of historic preservation states in Section 1 (b)(4), the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans. Additionally, the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et seq. calls for the protections of visual resources. Section 102 (a)(8). States that ...the public lands be managed in a manner that will protect the quality of the...scenic...values.... Section 103 (c). Identifies scenic values as one of the resources for which public land should be managed. Section 201 (a). States that The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including...scenic values).... Section 505 (a). Requires that Each right-of-way shall contain terms and conditions which will... minimize damage to the scenic and esthetic values.... Also, further support for the protection of aesthetics comes from the National Environmental Policy Act of 1969, 43 U.S.C. 4321, which states in Section 101 (b)(3) that measures be taken to ...assure for all Americans safe, healthful, productive and esthetically and culturally pleasing surroundings. Protections against disruptions to the viewscales and aesthetics of historic properties in Twin Falls County and the surrounding areas by Lava Ridges 400 wind turbines on 76,000 acres are an integral part of the preservation laws cited and must be implemented by the BLM.
Friends of Minidoka	DECI09 - 9 - Agency Planning Regulations or Federal Laws	Japanese American Confinement Sites Act. In 2006, Congress passed bipartisan legislation to provide for the preservation of the historic confinement sites where Japanese Americans were detained during World War II. Known as the Japanese American Confinement Sites Act, the Act directed the Secretary of the Interior to: create a program within the National Park Service to encourage, support, recognize, and work in partnership with citizens, Federal agencies, State, local, and tribal governments, other public entities, educational institutions, and private nonprofit organizations for the purpose of identifying, researching, evaluating, interpreting, protecting, restoring, repairing, and acquiring historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nations commitment to equal justice under the law. 16The law defines historic confinement sites to include Minidoka's historic footprint, which includes approximately 33,000 acres as depicted in Figure 9.2 from the NPSs Confinement and Ethnicity publication. 17
Friends of Minidoka	DECI09 - 9 - Agency Planning Regulations or Federal Laws	National Historic Preservation Act of 1966. The NHPA states that it is the policy of the Federal Government, in cooperation with other nations and in partnership with States, local governments, Indian tribes, Native Hawaiian organizations, and private organizations and individuals, to (3) administer federally owned, administered, or controlled historic property in a spirit of stewardship for the inspiration and benefit of present and future generations. Pursuant to the NHPA, the U.S. Bureau of Reclamation worked to add a portion of the former Minidoka Relocation Center to the National Register of Historic Places in 1979. The National Register nomination states that: The ruins of Camp Minidoka are tangible reminders of one of the most serious and painful contradictions of our country's philosophy of freedom. Through a nefarious legal fiction, over 110,000 loyal Americans were wrenched from their homes and forcefully detained without due process of law, in bleak, barbed-wire enclosed camps scattered over isolated inland areas on desolate tracts of Federal land. The concrete slabs, dilapidated shacks, and scattered refuse surrounded by rich farmland much of it reclaimed by the camp's inmates, is also a memorial to the suffering and remarkable courage of the Japanese-Americans of that time. Despite being less than 50-years old, this site represents an exceptional chapter in the history of the United States that should always be remembered. Commemoration of this event should take place before memories fade and the sharpness of the event is dulled by time. Bainbridge Island Japanese American Memorial Study Act of 2002. In 2002, Congress passed legislation (P.L. 107-363) to authorize the National Park Service to study the Eagledale Ferry Dock site as a potential addition to the National Park System. After the NPS completed the study, Congress added Bainbridge Island to Minidoka through the 2008 legislation. Committee Report to Accompany the Redwood Act of 1978. While not in statute, the Senate Energy Committee Report which accompanied the Senate Bill demonstrates the intent of Congress that the Secretary safeguard and protect units of the National Park System: The Secretary has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever action and seek whatever relief as will safeguard the units of the National Park System. 19The committee fully expects and intends that the executive branch will utilize every authority to protect and safeguard the property of the United States from adverse activities outside the park boundaries. 20
U.S. Environmental Protection Agency	DECI09 - 9 - Agency Planning Regulations or Federal Laws	Describe the current quality and capacity of habitat and its use by bats and avian populations in the proposed project area, how the proposed project will meet requirements under the ESA, the Migratory Bird Treaty Act, and the Bald and Golden Eagle Protection Act
Japanese American Confinement Sites Consortium	DECI09 - 9 - Agency Planning Regulations or Federal Laws	JACSC acknowledges the importance of Minidoka's status as a National Register of Historic Places listed property, but recognizes the limitations of the nomination as related to the time at which it was submitted. There has been a significant amount of research and work to properly record and preserve a greater understanding of the wartime incarceration, and the boundaries of the protected portions of the Minidoka site itself have expanded over time. As the Register listing doesn't take into consideration the role of the National Park Service or Bureau of Land Management in managing the associated historic property of Minidoka today, we ask that the BLM assess the eligibility of the original 33,000-acre Minidoka landscape for listing on the National Register as part of the current planning and consultation process. Section 110 of the NHPA places an affirmative responsibility on federal agencies to manage and maintain historic properties under their jurisdiction or control. Furthermore, this section provides that historic properties not under agency jurisdiction or control but potentially affected by agency actions are to be fully considered in agency planning. Since BLM owns and manages portions of the Minidoka landscape, the Bureau has an affirmative responsibility under Section 110 to determine the landscape's eligibility for listing. Furthermore, while private ownership of portions of the landscape is a complicating factor, mixed ownership is not automatically disqualifying for listing on the National Register.

Commenter	Comment Code	Comment Text
Japanese American Confinement Sites Consortium	DECI09 - 9 - Agency Planning Regulations or Federal Laws	<p>By law via the Organic Act of 1916 the National Park Service is required to manage each units fundamental resources and values unimpaired for future generations. Accordingly, JACSC requests that the project proponent and the BLM ensure that Minidoka National Historic Site's fundamental resources and values can be managed unimpaired for future generations. As stated the sites Foundation Document, these values include: Environmental Setting: Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.</p> <p>Commemoration and Healing: Minidoka provides a place for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history.</p> <p>Public Understanding, Education, and Involvement: Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today.</p> <p>Post-World War II Homesteading: Minidoka contains historic structures and the cultural landscape associated with the post-World War II era homesteading period, including the Farm-in-a-Day property, and agricultural uses that continue in southern Idaho to this day.</p>
Coalition to Protect America's National Parks	DECI09 - 9 - Agency Planning Regulations or Federal Laws	<p>Comment # 1: The proposed action violates the spirit and letter of P.L. 109-441, an Act to Provide for the Preservation of Japanese American Confinement Sites.21</p> <p>The Act requires the Secretary to establish a program within the National Park Service for the purpose of identifying, researching, evaluating, interpreting, protecting, restoring, repairing, and acquiring historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nations commitment to equal justice under the law. (Emphasis added.) As stated in the law, this is an all of the above mandate; not a discretionary or none of the above decision option for Interior agencies.</p> <p>The proposed action, a massive wind farm development with up to 400 wind turbines with a maximum height of up to 740 feet, will be highly visible, dominate the landscape, and overwhelm the scenic vistas immediately north and northeast of Minidoka National Historic Site (NHS). Moving forward with the proposed action, as described, would be the antithesis of the Acts mandate to right the injustice of Nikkei incarcerations and demonstrate the Nations commitment to equal justice under the law.</p> <p>To be frank, BLMs proposed action seems ignorant of or indifferent to the unjust treatment suffered by or the amazing resiliency demonstrated by the Nikkei community at Minidoka during one of the gravest American civil rights injustices of the 20th century. Consistent with P.L. 109-441, BLM should fully embrace its consultation responsibilities with the Nikkei community, listen to their concerns, and consider the historical and cultural context of the Minidoka landscape that BLMs proposed action would irreparably harm.</p>
Coalition to Protect America's National Parks	DECI09 - 9 - Agency Planning Regulations or Federal Laws	<p>Comment # 10: Section 106 compliance under the NHPA and Section 107 compliance under the ESA should be fully integrated into the DEIS are required under 40 CFR 1501.2 of the CEQ NEPA implementing regulations.</p> <p>We have heard that BLM may have considered preparing its NEPA review in advance of and separately from its NHPA Section 106 and ESA Section 107 consultations. However, the guidance in the CEQ NEPA implementing regulations is clear the respective consultation requirements should be conducted coincident with the NEPA review. And the resulting documentation should be integrated into one document, the DEIS, subject to public comment at the same time as the NEPA analysis.</p>
Idaho Conservation League	DECI11 - 11 - State or Local Permits	Other venues for the protection of the Minidoka National Historic Site outside of the BLM permitting process would be a review of county planning and zoning regulations and discussions with planning and zoning staff and county commissioners of Jerome, Minidoka and Lincoln counties. In other areas, scenic easement agreements have successfully been used with willing private landowners to keep rural landscapes in production while protecting these areas from inappropriate forms of development.
Idaho Conservation League	DECI11 - 11 - State or Local Permits	<p>This way the NEPA process can dovetail with the local permitting process. Potential issues that might be of interest to the counties are road maintenance and repair agreements and how construction traffic might conflict with local traffic. Here are some relevant excerpts from county planning and zoning documents:</p> <p>Goals: Encourage the managed use of natural resources in the county that best represents the interests of the citizens of the county. Encourage the maintenance of public access to public lands in the county. -Lincoln County Comprehensive Plan, p. 19.</p>
Star Lake Grazing Permittees	DF01 - 1 - General	<p>The Required Design Features or RFDs are identified in the 2015 Idaho ROD-ARMPA at Appendix C, Table C-1. The RFDs include, among others, the following:</p> <p>General</p> <ol style="list-style-type: none"> 1.Solicit and consider expertise and ideas from local landowners, working groups, and other federal, state, county, and private organizations during development of projects. 2.No repeated or sustained behavioral disturbance (e.g., visual, noise over 10 dbA at lek, etc.) to lekking birds from 6:00 pm to 9:00 am within 2 miles (3.2 km) of leks during the lekking season. 3.Avoid mechanized anthropogenic disturbance, in nesting habitat during the nesting season when implementing: 1) fuels/vegetation/habitat restoration management projects, 2) infrastructure construction or maintenance, 3) geophysical exploration activities; 4) organized motorized recreational events. 4.Avoid mechanized anthropogenic disturbance during the winter, in wintering areas when implementing: 1) fuels/vegetation/habitat restoration management projects, 2) infrastructure construction or maintenance, 3) geophysical exploration activities; 4) organized motorized recreational events. <p>2015 Idaho ROD-ARMPA, Appendix C, at page C-2. Lands and Realty</p> <ol style="list-style-type: none"> 52.Where technically and financially feasible, bury distribution powerlines and communication lines within existing disturbance. 53.Above-ground disturbance areas would be seeded with perennial vegetation as per vegetation management. 54.Place infrastructure in already disturbed locations where the habitat has not been fully restored. 55.Cluster disturbances, operations (fracturing stimulation, liquids gathering, etc.) and facilities as close as possible. 56.Co-locate linear facilities within one mile of existing linear facilities. 57.Micro-site linear facilities to reduce impacts to sage-grouse habitats. 58.Locate staging areas outside the Priority Habitat Management Areas to the extent possible. 59.Consider collocating powerlines, flowlines and pipelines under or immediately adjacent to a road or adjacent to other pipelines first, before considering co- locating with other ROW. 60.Restrict the construction of tall facilities and fences to the minimum number and amount needed. 61.Use free standing structures where possible, to limit the use of guy wires. Where guy wires are necessary and appropriate bird collision diverters would be used, if doing so would not cause a human safety risk. 62.Place new utility developments (power lines, pipelines, etc.) and transportation routes in existing utility or transportation corridors. 63.Construction and development activities should conform to seasonal restrictions. <p>2015 Idaho ROD-ARMPA, Appendix C, at pages C-6 to C-7.</p> <p>Roads</p> <ol style="list-style-type: none"> 88.Utilize existing roads, or realignments of existing routes to the extent possible. 89.Design roads to an appropriate standard no higher than necessary to accommodate their intended purpose. 90.Do not issue ROWs or SUAs to counties on newly constructed energy or mineral development roads, unless for a temporary use consistent with all other terms and conditions included in this document. 91.Establish speed limits on BLM and FS system roads to reduce vehicle/wildlife collisions or design roads to be driven at slower speeds. 92.Coordinate road construction and use among ROW or SUA holders. 93.Construct road crossings at right angles to ephemeral drainages and stream crossings. 94. Use dust abatement on roads and pads. 95. Close and reclaim duplicate roads by restoring original landform and establishing desired vegetation. <p>2015 Idaho ROD-ARMPA, Appendix C, at page C-9. Reclamation Activities 99.Include objectives for ensuring habitat restoration to meet sage-grouse habitat needs in reclamation practices/sites (Pyke 2011). 100.Address post reclamation management in reclamation plan such that goals and objectives are to protect and improve sage-grouse habitat needs.</p> <ol style="list-style-type: none"> 101.Maximize the area of interim reclamation on long-term access roads and well pads, including reshaping, topsoiling and revegetating cut-and-fill slopes.

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		102.Restore disturbed areas at final reclamation to the pre-disturbance landforms and desired plant community. 103.Irrigate interim reclamation if necessary for establishing seedlings more quickly. 104.Utilize mulching techniques to expedite reclamation and to protect soils. 2015ho ROD-ARMPA, Appendix C, at pages C-9 to C-10.
National Parks Conservation Association	DF01 - 1 - General	For example, the following Wind PEIS BMPs are particularly important for addressing wildlife impacts: Operators shall evaluate avian and bat use of the project area and design the project to minimize or mitigate the potential for bird and bat strikes. Scientifically rigorous avian and bat use surveys shall be conducted; and the amount and extent of ecological baseline data required shall be determined on a project basis. Turbines shall be configured to avoid landscape features known to attract raptors, if site studies show that placing turbines there would pose a significant risk to raptors. Procedures shall be developed to mitigate potential impacts to special status species. Such measures could include avoidance, relocation of project facilities or lay-down areas, and/or relocation of biota. Operators shall conduct surveys for federal and/or state-protected species and other species of concern (including special status plant and animal species) within the project area and design the project to avoid (if possible), minimize, or mitigate impacts to these resources. Operators shall identify important, sensitive, or unique habitats in the vicinity of the project and design the project to avoid (if possible), minimize, or mitigate impacts to these habitats (e.g., locate the turbines, roads, and ancillary facilities in the least environmentally sensitive areas; i.e., away from riparian habitats, streams, wetlands, drainages, or critical wildlife habitats).
U.S. Environmental Protection Agency	DF01 - 1 - General	Incorporate into the project planning the 2012 USFWS guidelines and recommendations on how to avoid and minimize impacts of land-based wind farms on wildlife and habitat.9
U.S. Environmental Protection Agency	DF01 - 1 - General	Identify measures to take to avoid, minimize, and mitigate the project impacts to birds and bats; and Consult the following resources for more information on avian impacts and best management practices: - Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006;10 - Reducing Avian Collisions With Power Lines: The State of the Art in 2012;11 - Eagle Risk Framework: A Practical Approach for Power Lines;12 and - Wildlife Impacts of Wind Energy.13
Idaho Conservation League	DF01 - 1 - General	We do appreciate the Design Criteria included in Appendix H of the Plan of Development and believe this provides a helpful starting point for addressing impacts. We look forward to additional refinements in the Design Criteria as informed by the NEPA process.
Idaho Conservation League	DF01 - 1 - General	Once the project components are located to avoid any remaining functional habitat, project activities should be conducted to minimize impacts to native species. Such minimization activities could include seasonal timing construction restrictions to minimize disrupting animals on winter range or during spring courtship activities or daily timing constructions in the case of sage-grouse. We note that if the sage-grouse mitigation framework (detailed later) is used to improve habitat in appropriate off-site locations, both sage-grouse and other sagebrush obligate species are likely to benefit.
Idaho Conservation League	DF01 - 1 - General	We support using previously impacted areas on public or private properties for temporary construction workspace, yards and staging areas. We also recommend reclaiming these areas to the extent possible.
Idaho Conservation League	DF01 - 1 - General	If there are unused stockpiles of gravel, rebar, concrete or other materials left over from construction, we recommend that Magic Valley Energy/LS Power offer these to the local communities when possible. Supplemental NEPA analyses may be needed if the impacts exceed those analyzed in the EIS.
Friends of Minidoka	EDIT01 - 1 - Editorial, Formatting, Maps	Many of the maps prepared by BLM and LS Power for scoping failed to include Minidoka NHS or were at such a large scale that it was difficult to understand the relationship of the project to the park. In future maps of the project, please include the following: Current park boundaries and land. Historic outline of the camp barracks blocks, administrative facilities and associated agricultural areas as shown on the Arai map included below. Historic camp footprint. Exhibit 9.2 from Confinement and Ethnicity. Original alignment of LS Power SWIP Line/Idaho Power ROW over the former Robeson property at the entrance to the park. Revised right-of-way of the SWIP line based on the Congressional approval of the relocation. Please include maps at several different scales that show the Lava Ridge project in relation to the park, barracks blocks and associated lands, and historic footprint.
National Parks Conservation Association	EDIT01 - 1 - Editorial, Formatting, Maps	We further request that the BLM identify all National Park Service sites in all future project maps so that the public can be informed about the resources at stake in the area.
Star Lake Grazing Permittees	FIRE01 - 1 - General	Independent of the impacts to the public land range improvements, what will happen to wildfire suppression during the construction phase (and after the construction phase)? Permittees and their families are all active in the Rural Fire Protection Association or RFPA and spend time each summer fighting wildfire on, among others, the Star Lake Allotment to protect the forage and related public land (and private land) resources. Is the applicant going to pay for wildfire suppression (either permanently or temporarily)? Permittees need answers on how wildfire suppression would work in and around the intended project. We assume that Magic Valley Energy would not want their windmills slathered with red fire retardant. We would also assume that any air tanker would not want to go near an 800-foot whirling turbine blade. Many times, the difference between success and failure in wildfire situations is the availability and use of air tankers. As such, this implicates the likelihood of larger wildfires in the future within the Star Lake Allotment due to inefficient or ineffective future wildfire suppression. More wildfire and/or larger fires will result in the Permittees facing more temporary reductions in grazing use due to lack of efficient / effective wildfire suppression tactics, like air tankers. How will that be addressed? Is the applicant going to pay for the temporary loss of AUMs due to future wildfire?
Individual	FIRE01 - 1 - General	The Plan also fails to identify how the power will be moved to the West Coast. It is obvious that it will require additional power lines to be built. T/he number one cause of wildfires in California is these high voltage line and hundreds if not thousands of miles of these high voltage lines will obviously cause even more wild fires.
Individual	FIRE01 - 1 - General	Another concern is when 1 of these windmills catch on fire and drop fire starter on the dry tinder that is abundant everywhere you propose. The current BLM cannot control fires very effectively with the amount of vehicles they possess today and most trucks will not be able to shoot water to the top of the generators.
Idaho Office of Energy and Mineral Resources	FIRE01 - 1 - General	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. A comprehensive set of measures to aid wildfire prevention and suppression throughout the Project life. Examples of wildfire measures include locations and water sources to supply fire-fighting infrastructure (e.g., fill stations for rangeland firetrucks and helicopter dip-tanks) and strategic fuel break locations. - Risk of weed and annual grass invasions into areas disturbed by the Project and management measures to ensure the Project would not exacerbate this threat and promote future wildfires.
Prescott Land and Livestock	FIRE01 - 1 - General	10) The height of the wind turbines could also interfere with aerial efforts to control range fires.10a) Proposed solution: As stated in 9a, a fire management plan needs to be developed and implemented that will address the lost ability to manage fire aerially. It is also recommended that 2 to 3 fire engines of at least a class 4 be provided for employees to control fire. Further, a select number of employees should be licensed to fight fire and could potentially become a part of the Notch Butte Rangeland Fire Protection Association (RFPA). 10b) Three wells with holding tanks to use for loading water in fire trucks and helicopters.
Prescott Land and Livestock	FIRE01 - 1 - General	Brush Control: Prescribed burns would be advantageous to the overall health of the Star Lake ecosystem.
Individual	FIRE01 - 1 - General	Damage to waterlines, wells and troughs. SLC have spent hundreds of thousands of dollars on water development for the allotment. This includes drilling five wells to depths of 600 to 800 feet, pumps, 60 to 80 miles of pipeline, underground wire to power pumps, water storage tanks, and troughs. In the last two years we spent nearly one hundred thousand dollars on water storage and pipe. The Storage tank was designed to provide a 150,000-gallon, ready source of water for fire suppression efforts, easily accessible for helicopter pickup and provide safe water storage for livestock. The ranchers and their families are all active in the RFPA and spend time each summer fighting fire on these and other allotments in the area. If approved and built, SLC want firm answers on how fire suppression would work in and around the site. We can't imagine that Magic Valley Energy would want their windmills slathered with red fire retardant, or that any air tanker would be persuaded to go near an eight-hundred-foot whirling turbine blade. With aerial firefighting many times being the difference between success and failure in these situations; how will that be addressed?
Prescott Land and Livestock	FIRE01 - 1 - General	Increased public access generally results in an increase in range fires due to carelessness. It is critical to address the ensuing fire risk in this arid environment. Prevention and management strategies must be in place to avoid the increased risk of catastrophic, anthropogenic-caused fire. The height of the wind turbines could also interfere with aerial efforts to control range fires. This fire issue will also need to be addressed.

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U.S. Environmental Protection Agency	FIRE01 - 1 - General	Consider and disclose the effects of the project on wildfire risk and fire management in the area including: - Potential effects on the frequency and severity of fires in the analysis area; - Need to suppress fires to protect project infrastructure due to potential influence on fire management decisions; and - Other hazards that may occur and identify what measures are available to prevent such hazards as well as the resources that are available to respond to them.
Idaho Conservation League	FIRE01 - 1 - General	Furthermore, there is a positive correlation between roads and human-caused ignitions.
Idaho Conservation League	FIRE01 - 1 - General	The BLM should examine how project construction and operations will affect both fire activity and suppression efforts. Because of the terrain, the majority of electrical lines are anticipated to be built above ground. The new overhead lines and increased vehicle use in the project area may increase the fire risks to the project area. While the new road network can act as a fuel break, we are concerned that aerial fire suppression activities will likely be more limited due to the wind turbines and supporting infrastructure. We appreciate the outline of fire prevention and fire fighting measures listed in the Health and Safety Plan (Appendix F) as a starting point for the NEPA analysis. We recommend having fire fighting equipment in multiple vehicles within each active construction area, having caches of fire fighting equipment located in key locations, and working with the local community to develop a Rangeland Fire Protection Associations for the project area as well as the surrounding area. Any replacement livestock watering ponds should be located so they are accessible for water tankers and helicopters. We do not recommend creating any additional fuel breaks off of roads in areas of native vegetation as there will already be significant habitat fragmentation from the new road system and this additional clearing of native vegetation will likely lead to increased annual invasives and require perpetual maintenance.
Individual	FIRE01 - 1 - General	Wildfire Prevention / Suppression When asked about wildfire prevention and suppression, at the April 24th information session at the Lincoln County Community Center, it became clear that the applicant is unfamiliar with the type and frequency of wildfire within the project area. As a former BLM wildland fire fighter in the Twin Falls BLM district, and an active member of the Notch Butte Rangeland Fire Protection Association, I was concerned about the applicants lack of knowledge and their proposed mitigation of wildfire risks both during the construction and operation phase of the project. On April 24th, a representative of the applicant referenced that the network of roads to be constructed as part of the project, including many that would be 16 feet wide, would provide a natural firebreak. Unfortunately, in the case of wind driven fires resulting from thunderstorm outflow winds or passage of cold fronts, a 16-foot-wide road often is insufficient to stop an advancing fire front, even in the grass fuel types present throughout much of the project area. Our experience living here is that these sorts of fires jump two-lane highways and that such fires require aerial firefighting resources to lay retardant lines that herd the fire away from sensitive resources or infrastructure. These fires may only stop when they burn into green agricultural land. Considering that the presence of the 700 ft plus tall towers rules out the use of aerial firefighting resources, the applicant should harden their infrastructure against damage from wildfire, and should take aggressive and thorough steps to prevent ignition during all phases of construction and operation of the project. Furthermore, they must take action to mitigate the loss of the most effective fire suppression tool available to us: aerial resources. Mitigation actions could consist of increased financial or in-kind support and coordination with local firefighting entities, support for wildfire prevention programs, managed fuel breaks in addition to the planned roads, and a robust fire prevention program and response plan for active fires. A brief review of the applicants Plan of Development, Appendix F, does indicate the applicant has improved their knowledge and approach since April 24th. However, there may still be additional items to address. Appendix F does not indicate what level of fire suppression training will be required of the applicants on-site employees or its sub-contractors, nor how many of the applicants on-site staff or subcontractors will actually receive training.
Individual	FIRE01 - 1 - General	The risk of wildfires would be increased.
Individual	FLGT01 - 1 - General	Agricultural Spray Aircraft - a nightmare waiting to happen. '740 high between lands to be treated and on an approved ag airstrip.
Individual	FLGT01 - 1 - General	Many corridors border private property used for production agriculture. These farms utilize aerial services to apply chemicals and fertilizer to crops throughout the year. How will MVE and the BLM ensure the location of turbine equipment will not impact typical farming operations on these private properties?
Individual	FLGT01 - 1 - General	This area is also utilized by General Aviation to train pilots. With the proposed height of these turbines, they are a danger to aircraft.
Individual	FLGT01 - 1 - General	I typically utilize aircraft to control coyotes and other predators that prey on my/sheep. The construction of these large wind turbines will greatly reduce my ability to control predators via air. The height of the wind turbines alone will inhibit or entirely eliminate this form of predator control. I anticipate sheep/lamb losses will increase by 50% or higher as a result.
Star Lake Grazing Permittees Sid Butte Livestock Association	GRAZ01 - 1 - General	Assuming a viable and feasible wind resource potential in the Star Lake Allotment, assuming the applicable Land Use Plan authorizes a Wind Project in the Star Lake Allotment, and assuming the applicant is capable of conforming to all applicable management direction in the Land Use Plan relative to any Wind Project in the Star Lake Allotment, the proposed project (through its construction, operation, and maintenance of its Wind Structures) will impact the Permittees annual authorized permitted use and Permittees annual authorized public land range improvements use, as well as maintenance, and will impact the Permittees overall livestock operations and local communities. The Notice requested comments on site-specific issues on how the proposed project may impact your grazing operations; adding that BLM will then explore possible alternatives or mitigation strategies that could be incorporated into a plan of development for the project which could include on-the-ground grazing mitigation, such as grazing practices, seasonal movements, range improvements (e.g., moving fences, water distribution), rerouting access, etc. Beyond what is already stated above, the Permittee proffer the following site-specific issues on how the proposed project may/will impact our grazing operations: (a)Suggested Affected Environment, according to Notice. The Notice forecasts at PDF page 7 Disturbance Acres during the construction phase and during the operational phase as to each of the Wind Structures within the Star Lake Allotment, as follows: As previously stated, the Permittees contends that the actual disturbance acres, as well as the actual zone of impact acres, will be significantly larger, impacting the entire landscape of the Star Lake Allotment given the riddling of Wind Structures across the Star Lake Allotment as illustrated on the Map in page 3 of this letter. This contention is based upon the following comments below. (b)Affected Environment as to Livestock Star Lake Allotment. The public lands within Star Lake Allotment are within a designated Grazing District established under the Taylor Grazing Act, 43 U.S.C. 315, and are available / allocated for livestock grazing by the applicable Land Use Plan as per the Federal Land Policy and Management Act, 43 U.S.C. 1712, see also 43 C.F.R. 4100.0-8 (10-1-2005 Edition). Based upon such designation and allocation, the Permittees separately own base property (in the form of private land) upon which Grazing Preferences and Permitted Use AUMs within the Star Lake Allotment are attached and through which BLM has issued and renewed Grazing Permits to the Permittees overtime within the Star Lake Allotment. The existing Permitted Use AUMs in the Star Lake Allotment are noted in Attachment #2 and are subject to (indefinite) renewal as long as the Permittees remain in substantial compliance with the grazing regulations and the terms in their respective Grazing Permits, and as along as the public lands remain allocated to livestock grazing. 43 C.F.R. 4110.1(b)(1), 4130.2(d) (10- 1-2005 Edition). The total Permitted Use AUMs equates to 24,940 AUMs, of which 17,770 AUMs are Active Use AUMs, and 7,170 AUMs is Suspended Use AUMs. The Permittees account for 15,660 AUMs of the total Permitted Use AUMs, of which 11,285 AUMs are Active Use AUMs, and 4,375 AUMs are Suspended Use AUMs. See Attachment Nos. 1 and 2. The Star Lake Allotment is inclusive for 98,139.01 acres according to BLM, and is divided / separated by fence into 15 separate pastures. The Permitted Use AUMs are annually rotated through these pastures generally between April 1 and September 30, and between November 1 and December 31, by cattle (in the form of cows and calves) and by sheep (ewes and lamb). The grazing rotation is coordinated with BLM to maintain and enhance the native species status and the seeded species status, as well as conform to other applicable resource objectives and rangeland health standards. The principle, adverse impact to these species has been wildfire due, in part, to the excessive fuel loading that exists in the Star Lake Allotment. The Permitted Use AUMs in the Star Lake Allotment is subject to change as per 43 C.F.R. 4110.3, 4110.3-3(b) (10-1-2005), and as per the applications submitted by the Permittees on May 8, 2009, to activate their respective Suspended Use AUMs in accordance with 43 C.F.R. 4110.3-1(b) (10-1-2005 Edition). These applications have been pending and not yet processed due to apparent other priorities by BLM. However, it would seem that if BLM is now going to take the time to assess the public lands within the Star Lake Allotment for an apparent anthropogenic disturbance purpose,2 such as wind turbines, BLM should also assess the public lands within the Star Lake Allotment for a non-anthropogenic disturbance purpose, such as to activate the Permittees Suspended Use AUMs (assuming compatibility, as discussed herein). The Permitted Use AUMs in the Star Lake Allotment is supported by a number of public land range improvements, including seedings, fences, and water developments. A list of these range improvements is available in the records and files of BLM. The Permittees hold an interest in these temporary and permanent range improvements. The law prescribes that should the public lands be disposed of or devoted to a public purpose which precludes livestock grazing, the Permittees are entitled to reasonable compensation for, but not to exceed the fair market value of his or her interest in authorized permanent range improvements located on these public lands. 43 C.F.R. 4110.4-2(b) (10-1-2 The 2015 Idaho ROD-ARMPA at page 5-1 defines Anthropogenic disturbances, as Human- created features that include paved highways, graded gravel roads, transmission lines, substations, wind turbines, oil and gas wells, geothermal wells and associated facilities, pipelines, landfills, agricultural conversion, homes, and mines. Emphasis supplied. 2005 Edition); see 43 C.F.R. 4120.3-6(c) (10-1-2005 Edition); see also 43 C.F.R. 4120.3- 3(c), 4120.3-5 (10-1-2005 Edition); see also 43 U.S.C. 315q (wherein it is stated that [w]henever use for war or national defense purposes of the public domain or other property owned by or under the control of the United States prevents its use for grazing, persons holding grazing permits . and persons whose grazing permits have been or will be canceled because of such use shall be paid out of the funds appropriated or allocated for such project such amounts as the head of the department or agency so using the lands shall determine to be fair and reasonable for the losses suffered by such persons as a result of the use of such lands for war or national defense purposes.).

Commenter	Comment Code	Comment Text
Star Lake Grazing Permittees Sid Butte Livestock Association	GRAZ01 - 1 - General	<p>(c)Impacts to livestock operations during construction phase of intended Wind Project.</p> <p>It has been found that construction activities would generally result in temporary impacts to existing livestock operations. 2005 FPEIS-Wind, Volume I, at page 5-86. If, for example, the area is used for grazing, livestock might need to be removed from the areas where blasting or heavy equipment operating are taking place. 2005 FPEIS-Wind, Volume I, at page 5-86. To this end, Permittees have the following site-specific comments as to the intended project on the Star Lake Allotment during the construction phase of the intended Wind Project.</p> <p>Permittee is informed that the applicant estimates that construction would take 2 years. However, constructing a project of this magnitude in the terrain and climate associated with the Star Lake Allotment in 2 years seems unrealistic, though, if accomplished, it would be at great cost to the resource. It is more likely that the construction phase will take several years.</p> <p>What will happen to the permitted livestock during the construction phase (and after the construction phase) to construct the intended 926 acres of project components or Wind Structures riddled throughout the Star Lake Allotment? See Table above, as well as Notice at PDF page 6. It is assumed that construction would be coordinated with the grazing rotational use by the permitted livestock so that construction and grazing use does not occur simultaneously in the same pasture(s). However, that seems unrealistic, given the likely need for the applicant to use the access roads3 throughout any grazing season to access the construction sites of the various other Wind Structures.</p> <p>Is the applicant going to pay for the lost AUMs (either permanently or temporarily)?</p> <p>Is the applicant going to pay for alternative forage for the lost AUMs (either via hay or via leased private pasture)?</p> <p>Finding leased private pasture in the area for 3,500 head of cattle would be practically impossible. If leased private pasture can be located, it would be at great expense and unfamiliar to the Permittees animals resulting in herd health issues. This is just reflecting what permitted livestock the Star Lake allotment supports. If you add the numbers from the other affected allotments including the North Milner, the Sid Butte, and the Dietrich Butte Allotments, 3,500 head of livestock likely increases to 5,000 to 6,000 head of cattle displaced in the area.</p> <p>Independent to the impacts to the Permitted Use AUMs, what will happen to the public land range improvements during the construction phase (and after the construction phase)? Such construction will likely damage fences, pipelines, troughs, and Wells.</p> <p>Is the applicant going to pay for any damage and/or repair to the existing public land range improvements (either permanently or temporarily)?</p> <p>Is the applicant going to pay for alternative or supplemental fences and water developments to mitigate any impacts (either permanently or temporarily)?</p> <p>Permittees have spent hundreds of thousands of dollars on water development in the Star Lake Allotment. This includes drilling 5 Wells to depths of 600 to 800 feet; installing pumps in the Wells; installing 60 to 80 miles of pipeline; installing underground wire to power pumps; installing water storage tanks; and installing troughs. In fact, all of the permittees in the Star Lake Allotment have spent nearly \$100,000 on a pipeline and water storage system in just the last 2 years. This storage tank was designed to provide 150,000-gallon ready source of water for livestock, as well as fire suppression efforts.</p>
Star Lake Grazing Permittees Sid Butte Livestock Association	GRAZ01 - 1 - General	<p>(d)Impacts to livestock operations after construction phase, but during operation phase & maintenance phase of the intended Wind Project.</p> <p>See (c) above, which is incorporated herein.</p> <p>The intended project creates 926 acres of separate Wind Structures on the Star Lake Allotment, and implicates the construction of 350 miles of new roads across the entire project area; easing the access by the applicant and resulting in much higher speed of travel and much more traffic. This endangers livestock and wildlife especially at night. Is the applicant going to pay for the loss of livestock injured or killed by motor vehicles?</p> <p>Permittees are informed that each wind turbine will emit sound approximately equivalent to a running lawn mower. Spaced at quarter mile increments there will be a constant drone. How does this affect livestock distribution within the Star Lake Allotment? What effect will increased electromagnetic fields have on livestock and wildlife health and reproduction? Permittees are informed that wind farms reduce precipitation and raise ground temperatures in the immediate area of the project. Is that true?</p> <p>Would that be true on the Star Lake Allotment as to its micro-environment? If yes, how will that be mitigated since that will directly, adversely impact the forage growth on the allotment? It has been found that cattle often cluster around wind turbines (e.g. for shade) where wind energy projects are located in grazing allotments. 2005 FPEIS-Wind, Volume 1, at page 5-57. How will that be mitigated, including any resulting disturbed areas? Permittees are concerned that any disturbed areas would/could likely impact achievement of applicable rangeland health standards.</p>
Star Lake Grazing Permittees Sid Butte Livestock Association	GRAZ01 - 1 - General	<p>Assuming the intended project is authorized, what will happen when the useful life of the project ends or the economics result in the need to abandon the project? What is the plan for decommissioning? And, assuming the intended project results in defacto disposing of or devoting (in whole or in part) the public lands in the Star Lake Allotment to wind energy development, what is plan upon recommissioning? Will the existing Permittees (or their successors or assigns) continue to hold the existing Grazing Preferences and Permitted Use AUMs so to be first-in-line for the allocation of the forage within the Star Lake Allotment in the future?</p> <p>It has been suggested to the Permittees that any permanent loss of AUMs will be minimal. This suggestion seems without foundation.</p>
Star Lake Grazing Permittees Sid Butte Livestock Association	GRAZ01 - 1 - General	<p>Permittees have taken great care to develop and protect the public land resources through rotational management, seedings, fencing, and water development so as to conform to land use plan objectives and rangeland health standards. As explained herein, this intended project will have devastating impacts to this development and protection without any clear answers / direction on how our investment will be maintained and enhanced or otherwise mitigated. Site excavation, heavy equipment mobilization, and blasting, and 350 miles of roadbuilding through all seasons will no doubt take a heavy toll. Cranes and heavy equipment will traverse the site with no regard for fences, pipelines, or buried wire. The forage resource will be damaged for years come, while the claim is that there will not be much land disturbance. The fact is that when working in all seasons, we all know when one route becomes impassable another will quickly be established. These ecosystems are fragile and disturbance leads to propagation of invasive species and noxious weeds.</p>
Individual	GRAZ01 - 1 - General	<p>The project will also take away 10,000 acres of grazing ground that has been available to graze cattle.</p>
Individual	GRAZ01 - 1 - General	<p>Livestock grazing - will livestock, sheep, cattle be allowed to graze thus limiting fuel load and aid in fire suppression? Will there be fences? Who will maintain those fences?</p>
Idaho Office of Energy and Mineral Resources	GRAZ01 - 1 - General	<p>The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project.</p> <ul style="list-style-type: none">- Livestock- Loss of forage due to Project construction phase and resulting infrastructure.- Decreases of available animal unit months (AUMs) for current grazing permittees.- Dust abatement to prevent increases of unpalatable forage along road corridors and construction sites.- Impacts to current and new rangeland infrastructure.- Responsibility for the cost of any new rangeland infrastructure required by the project such as, new fences, cattle guards, etc.- Minimization of livestock displacement due to increased disturbances in the Project area.
Individual	GRAZ01 - 1 - General	<p>This area is open range land used by rancher for the last 150 years for grazing and this project would alter this area forever.</p>
Prescott Land and Livestock	GRAZ01 - 1 - General	<p>1) This project can result in increased livestock death loss and/ or injuries due to major construction disturbances, additional road development resulting in increased public access, and reduced forage production. 1a.) Proposed solution: Establish a depredation fund based off permittees' current death loss records vs. death loss during wind turbine project construction and full implementation. Data needs to be collected regarding current forage production for useable acres vs. forage production during and after the project construction so this can be measured and compensated for. Permittees also need to be notified if stocking rates will be changed as a result of this project. Stocking rates have a significant impact on our livelihoods.</p>
Prescott Land and Livestock	GRAZ01 - 1 - General	<p>2) Construction disturbances will result in reduced conception rates in sheep and cattle. Animal stress incurred as a result causes early and late term abortions. In addition, intact males (bulls and bucks) can have reduced libido, inhibiting natural breeding. Increased disturbances will also keep intact males away from females reaching estrus. Further, breeding disturbances will result in late lambs and calves which reduces weaning weights and affects overall income of operations. These later pregnancies result in females that are always behind in breeding cycles, affecting uniformity of livestock, marketability, and overall profit reduction.2a.) Proposed solution: Establish a depredation fund based off permittees current pregnancy detection records vs. during and after project construction and implementation. Additional creative solutions could include cross fencing with adequate water supplies to manage livestock stress.</p>
Prescott Land and Livestock	GRAZ01 - 1 - General	<p>3) Construction disturbances will impact lambing and cause late term abortions. In addition, lamb loss will increase by 50% as a result of reduced predator control options. The reason being is that wind turbines essentially limit sheep producer's ability to use aerial support for predator control. As a result, predator populations will increase. Additionally, an increased incidence of twin lamb separation from the ewe will increase. The ewe will not find the lost lamb which results in death of the lost lamb. Since most ewes produce twins, this results in a minimum 50% reduction in lamb crop.3a.) Proposed solution: This is an extremely difficult issue to manage. Currently, the best solution is to establish a depredation fund for affected permittees until other solutions can be identified and developed.</p>

Commenter	Comment Code	Comment Text
Prescott Land and Livestock	GRAZ01 - 1 - General	4) Construction disturbances and resulting forage reduction will decrease weaning weights in calves and lambs and decreased Body Condition Scores (BCS) in cattle and sheep. This equates to additional feeding costs when livestock are removed from the allotment and taken to home operations. The additional feeding costs are a direct result of having to increase pounds fed per day to achieve optimum BCS for calving and lambing seasons.4a.) Proposed solution: The development of strategic fencing and water developments to keep livestock away from construction disturbances has the potential to resolve this problem. 4b.) Financial responsibilities to facilitate livestock for lost AUMs during construction will need compensation. Some of those responsibilities include, but not limited to, acquiring, renting, and hauling livestock to another allotment. As well as additional labor to manage livestock.
Prescott Land and Livestock	GRAZ01 - 1 - General	5) The reduced forage loss and overall useable grazing acres attributed to the construction of new access roads, increased populations of invasive species, etc. will have a notable impact on livestock.5a.) Proposed solution: Data needs to be obtained to measure actual forage loss and loss of useable grazing acreages as a result of this project. This issue can be addressed twofold: 1) provide compensation for production losses and/ or 2) develop strategically located cross fences with water developments to utilize areas not directly impacted by the wind turbines.
Prescott Land and Livestock	GRAZ01 - 1 - General	6) This project has the potential to decrease stocking rates resulting in decreased Animal Unit Months (AUM's) for permittees.6a.) If this problem does result, permittees need to be fairly compensated for the lifelong loss of grazing with a type of depredation fund or a price per A UM before construction is started.
Prescott Land and Livestock	GRAZ01 - 1 - General	9) This project will open additional access venues for recreationists, hunters, and other outdoor enthusiasts. With increased public numbers, livestock owners often see livestock shot and an increase in range fires due to carelessness. Further, gates are often left open, fences are cut, livestock are out, and permittees lose livestock.9a) Proposed solution: The construction and strategic placement of cattleguards on all main roads before windmill construction begins. Cattle guards with berms or other mechanisms to prevent soil and debris fill will help reduce the incidence of opened gates, cut fences, and cattle out. Fire management plans need to be developed and implemented to address the increased fire risk. Signage may also help address public desecration to a point.
Prescott Land and Livestock	GRAZ01 - 1 - General	11) Disturbed areas must be re-seeded/re-habilitated with appropriate grass and forb mixes. Have plans been made to address this critical need when public land is disturbed to such a large extent? Federal guidelines require native species be utilized which tend to take several years to establish adequately. Strategic planning and use of weather patterns must be observed to enhance stand establishment and longevity.
Prescott Land and Livestock	GRAZ01 - 1 - General	All existing range improvements should be maintained by Magic Valley Energy and permittees, and other landowners bordering the Star Lake Allotment. Open Range Law dictates that the landowner or lessee of the property that is adjacent to the range unit will maintain fences bordering range units.
Prescott Land and Livestock	GRAZ01 - 1 - General	Fences should be strategically located to enhance forage and water use for optimum livestock and wildlife health. This fencing will also make it easier during windmill construction to keep cattle from being moved too often. Water developments are crucial for mitigation of the Lava Ridge Wind Project. Water can be used to manage the health of the ecosystem, livestock, wildlife, habitat, and forages. It can be used to minimize impacts from the wind project for all affected resources. Wells placed in pastures that make use of gravity flow principles and power as well as adequately sized pipe and stock troughs can be very beneficial in meeting resource objectives. Enclosures around water sources can be used in different pastures.
Prescott Land and Livestock	GRAZ01 - 1 - General	Drought situations occur frequently on this allotment. Recent years have been rather challenging due to severe drought and open winters. Gophers and other rodents do affect plant production, particularly in the spring and summer months. Mitigation measures should take frequent drought conditions into account.
Individual	GRAZ01 - 1 - General	We have taken great care to develop and protect this resource through seedings, fencing and water development. This project will be devastating to our water systems. Site excavation, heavy equipment mobilization, and blasting and 350 miles of roadbuilding through all seasons will no doubt take a heavy toll. Cranes and heavy equipment will traverse the site with no regard for fences, pipelines or buried wire. The forage resource will be damaged for years come, while the claim is that there will not be much land disturbance. The fact is that when working in all seasons, we all know when one route becomes impassable another will quickly be established. These ecosystems are fragile and disturbance always leads to propagation of invasive species and noxious weeds.
Individual	GRAZ01 - 1 - General	3.During the construction phase of this project SLC fear the allotment will be unusable for grazing. For the reasons stated above. LS Power estimated that construction would take only two years. Constructing a project of this magnitude in this terrain and climate in two years seems unrealistic, if accomplished it would be at great cost to the resource. It is more likely to take several years. However long the construction phase is during this time, where do we graze our cattle? Finding pasture in the area for 3500 head of cattle is would be impossible. If pasture can be located, it would be at great expense and unfamiliar to our animals resulting in herd health issues. This is just reflecting what the Star Lake allotment supports. If you add the numbers from the other affected allotments including North Milner, Sid Butte and Dietrich Butte, 3500 head of livestock likely increases to five or six thousand head displaced in the area. Those cattle alone likely generate economic activity of 6 to 7 million a year that goes directly in to the local economy.
Individual	GRAZ01 - 1 - General	The project creates 350 miles of new roads with much higher speed of travel and much more traffic. This endangers livestock and wildlife especially at night. LS Power has stated that each turbine will emit sound approximately equivalent to a running lawn mower. Spaced at quarter mile increments there will be a constant drone. How does this affect animals inhabiting the area? What effect will Increased electromagnetic fields have on livestock and wildlife health and reproduction?
Prescott Land and Livestock	GRAZ01 - 1 - General	Over 1,200 acres and 255 Animal Unit Months (AUM's), will be affected during the construction phase alone. I understand the operational phases will have a smaller impact. However, based on this data and prior informational meetings with Magic Valley Energy, I see several potential problems for existing permittees and other users.
Prescott Land and Livestock	GRAZ01 - 1 - General	The proposed infrastructure, particularly the 359 miles of roads, (of which I am not clear how many miles will actually be developed on the Sid Butte Desert allotment), will cause a substantial amount of disturbance both ecologically and publicly. Well-developed roads will create a public "playground" for individuals and groups that are often known to create livestock and environmental disturbances. There will be additional access venues for recreationists, hunters, and other outdoor enthusiasts. Fences will be destroyed, gates will be left open, animals may be shot (resulting in fatalities and/or wounds), and young animals, especially lambs, may be stolen. It is paramount to find some resolution to the many problems the enhanced roads will create. Please be aware, the public will travel these roads at high rates of speed, creating several additional problems that can lead to increased livestock death loss and/or injuries, wildlife death loss, and other damages.
Prescott Land and Livestock	GRAZ01 - 1 - General	Initial construction disturbances from the new infrastructure, particularly the roads and the actual wind turbine sites will impact lambing operations. These disturbances will create a situation where ewes lose a twin and/or experience late term abortions.
Prescott Land and Livestock	GRAZ01 - 1 - General	Conception rates may be reduced in sheep and cattle. Animal stress incurred as a result of construction disturbances causes early and late term abortions. In addition, intact males (bulls and bucks) may experience reduced libido, inhibiting natural breeding. Increased disturbances will also keep intact males away from females reaching estrus. Further, breeding disturbances will result in late lambs and calves which reduces weaning weights and affects overall operation profitability. Later pregnancies result in females that are always behind in breeding cycles, affecting uniformity of calf and lamb crops and an ensuing profit reduction for ranch families. Increased stress will lead to decreased weaning weights in calves and lambs as a result from the initial development phases of the wind project activities. Decreased Body Condition Scores (BCS) in cattle and sheep may be reduced as a result of lost forage production and stressors from construction activity. This could also possibly equate to additional feeding costs when livestock are removed from the allotment and taken to home operations. The additional feeding costs are a direct result of having to increase pounds fed per day to achieve optimum BCS for calving and lambing seasons since animals may lose one to two BCS from increased stress due to project activities. A loss of useable grazing acreage due to construction of new access roads, wind turbine sites, and forage production (lbs./ac) loss due to disturbances, and increased populations of invasive species, annual species, and other undesirable vegetation will impact livestock grazing by decreasing desirable forage production. A potential risk of decreased stocking rates resulting in a reduction of AUM's for permittees, further decreasing family ranch income may result.
Prescott Land and Livestock	GRAZ01 - 1 - General	The overall scope, depth, and nature of this project warrants the addition of strategically placed cattleguards, a new well along with water developments including water lines, pumps, solar power, and troughs to mitigate construction disturbances. Additional fences may be needed. Further, boundary fences must be improved because construction activities may force livestock through fences. Disturbed areas must be reseeded/re-habilitated with appropriate grass and forb mixes. Grazing flexibility must be granted to permittees to help mitigate these many issues. Most importantly, it is critical to provide appropriate management infrastructure prior to project development so Idaho ranchers can maintain their livelihoods.
Hidden Valley Organic Dairy Farm	GRAZ01 - 1 - General	The area around the Kimama Butte has been used for the grazing of sheep and beef cattle for generations. The proposed Lava Ridge Wind Project puts decades of livestock grazing at risk as well as dairy operations in the area. In a paper titled "SUMMARY OF RECENT RESEARCH ON ADVERSE HEALTH EFFECTS OF WIND TURBINES" by Keith Stelling, we learn that "There is growing evidence that animals are affected even more severely than humans by the low frequency noise and vibrations from industrial wind turbines." "Laboratory studies upon animals have been reviewed with quite chilling results, as it clear that deformities, damage and impairment occur to the subjects with regularity. Admittedly the animals were contained and subjected to exposure times of several hours per day at moderate to high intensity levels of LFN and infrasound. Yet fish and aquatic creatures contained in ponds and lakes would certainly be unable to escape whatever the level of sound intensity or duration of exposure". Buxton cites as examples of the effect of noise on animals: the reduction of egg laying by domestic poultry; injury and loss involving livestock; goats with reduced milk production; pigs with excessive hormonal secretion as well as water and sodium retention; sheep and lambs with increased heart rates, respiratory changes and reduction in feeding. "There is clearly a cause for concern because of the likely effects upon wildlife and current protective measures seem inadequate". (Stelling & Phyt, 2009) Keith Stelling goes in his article to cite the experience of a farmer who lived near an industrial wind farm.

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		<p>"Awareness of the research cited by Buxton (above) indicating endocrine and cardiovascular effects from noise would certainly support the symptoms observed by Ontario farmer Ross Brindley who lives near the Kingsbridge wind turbine development near Goderich. According to a report in the December 2008 Better Farming Magazine, his cattle exhibited aggressive and erratic behaviour, "including the kicking of newborn calves, prolapsed birthing, weight loss, decline in fertility, a high incidence of mastitis, calves being deformed at birth and a high incidence of stillbirths." After being driven out of business as a result of problems suffered by his beef cattle herd, Brindley is suing Hydro One Networks Inc. and Edmonton Power Corporation (EPCOR)."</p> <p>"In the same context, the BBC recently reported that 400 goats in Taiwan had died after eight wind turbines were installed close to their grazing land. "The goats looked skinny and they weren't eating. One night I went out and the goats were all standing up; they weren't sleeping", the farmer reported. The Council of Agriculture suspects that noise may have caused the goats' demise through lack of sleep." (Stelling & Phyt, 2009)</p> <p>On another website (wind-watch.org) we learn even more stories of mass death and sickness in animals that live near windfarms</p> <p>"In an article titled Are Wind Turbines Killing Innocent Goats? Discovery Magazine reported that a Taiwanese farmer blames the death of 400 goats on a nearby wind facility. His claim is backed up by a local livestock inspector who said unusual sounds can impact animals' appetite, growth and sleep. The farmer has stated that the goats had been unable to sleep and began losing weight prior to their deaths."</p> <p>"In Wisconsin, a farmer who tells his story on YouTube describes losing 19 cattle that died or had to be put down because they were "pretty much lifeless." In addition, 30 calves have died. The farm is within a mile of a wind facility. One cow removed from the site and moved elsewhere later recovered, the farmer stated."</p> <p>"Dr. Nina Pierpont, author of Wind Turbine Syndrome, interviewed a horse breeder who lost six of eight babies after wind turbines were erected nearby his breeding mares. Some aborted early, others had no milk and others didn't conceive.</p> <p>"I've been in the horse business for 45 years," the rancher said. "I don't know whether there's dirty electricity in the ground, I don't if they keep them from sleeping ... but there's something."</p>
Individual	GRAZ01 - 1 - General	9.Years ago, permitted cattle grazers had their AUM allotments diminished due to wildlife concerns, ie. sagegrouse, desert shrimp, deer, antelope, and elk. All of these species still exist.
Individual	GRAZ01 - 1 - General	11.Second and third generation BLM permitted cattle grazers will loose massive amounts of grazing acres. To quote Lava Ridges own words " 400 wind energy turbines, 7 substations,250 miles of collector transmission lines,381 miles of access roads, 47 miles of crane paths, battery energy storage system,3 operation and maintenance facilities, 5 permanent met towers, and construction -related staging yards-all for towers 740 feet tall". this leaves little room for grazing acres, not to mention the stress to cattle(cows, calves, and bulls).
Idaho Conservation League	GRAZ01 - 1 - General	The BLM needs to describe how local agricultural operations (allotment management, water projects for livestock, fencing for livestock, irrigation pivots, canals, crop dusting and truck traffic) will be affected by project construction and operations. We believe that wind projects are largely compatible with agricultural and pastoral activities but acknowledge that some shifts in practices may be required. Some issues may be addressed in the location of turbines and roads and seasonal or daily timing restrictions during construction activities. Should any upgrades in agricultural operations be needed, such as for irrigation, pesticide or herbicide application, or livestock fencing, we recommend that affected producers work directly with Magic Valley Energy/LS Power and the BLM on site specific design features. It may be that there are improved methods for pesticide application, for example, that are more sensitive to the environment than current practices. There have also been some recent developments with regard to virtual fencing that might help address any fence modifications.
Individual	GRAZ01 - 1 - General	Over 1,200 acres and 255 Animal Unit Months (AUM's), will be affected during the construction phase alone. I understand the operational phases will have a smaller impact. However, based on this data and prior informational meetings with Magic Valley Energy, I see several potential problems for myself and other existing permittees.
Individual	GRAZ01 - 1 - General	The proposed infrastructure, particularly the 359 miles of roads, will cause a substantial amount of disturbance for my sheep operation. Well-developed roads will create a public "playground" for individuals and groups that are often known to create livestock and environmental disturbances. There will be additional access venues for recreationists, hunters, and other outdoor enthusiasts. Fences will be destroyed, gates will be left open, animals may be shot (resulting in fatalities and/or wounds), and young animals, especially lambs, may be stolen.
Individual	GRAZ01 - 1 - General	The incidence of foster lambs will be increased substantially. This will occur when someone drives by ewes that have recently lambed. The traffic and anthropogenic disturbance will scare ewes from their lambs, causing at least one twin to be separated from its mother. Each stressful event will leave at least one lamb on its own. If the lamb is not picked up and fed manually, it will starve to death. This problem has the potential to reduce my income by at least 50 - 60%. I will need to hire additional employees for the sole purpose of looking and caring for starving foster lambs. At minimum, I would need reimbursement for foster lamb loss and/or care if they can be located and saved.
Individual	GRAZ01 - 1 - General	As a result of the initial development phases of the wind project, we will see increased stress to sheep which will lead to decreased weaning weights in lambs.
Individual	GRAZ01 - 1 - General	To summarize, the foster lamb situation created by the development of the Lava Ridge Wind Project has the potential to put me out of business. I cannot survive a 50 - 60% or even higher lamb loss. The increased predator populations will be substantial as well since wind turbines will inhibit aerial control. I will see a 50% or higher increase in death loss as a direct result from not being able to use aerial support for predator control.
Individual	GRAZ01 - 1 - General	The overall scope, depth, and nature of this project warrants the addition of strategically placed cattleguards and gates, a new well along with water developments -including water lines, pumps, solar power, and troughs to mitigate construction disturbances. Additional fences may be needed. Further, boundary fences must be improved because construction activities may force livestock through fences. Disturbed areas must be re-seeded/re-habilitated with appropriate grass and forb mixes. Grazing trexibility must be granted to permittees to help mitigate these many issues. Most importantly, it is critical to provide appropriate management infrastructure prior to project development so Idaho ranchers can maintain their livelihoods. Sheep ranchers need compensation to hire employees to find and care for foster lambs. Plans need to be developed to mitigate lamb loss and to control predator populations.
Individual	HAZ01 - 1 - General	the harm they will do to the environment as they start to fail and spill their 80 GALLONS of oil that each one of those turbines requires to work
Individual	HAZ01 - 1 - General	An additional concern is how the windmills with their many parts will be recycled when their life expectancy is complete. My understanding is that they are not currently recyclable. I don't believe there are many if any people in our area who would like to see our pristine desert or any area around used as a dumping ground for an entity that will come and use up our landscape and resources and go on their merry way leaving waste, toxic liquids, metals and whatever laying around to be buried or whatever without an acceptable plan for dismantling and recycling when the time comes.
Individual	HAZ01 - 1 - General	Given the life span (about 20years) of existing wind turbine components and the materials used in constructing the components, particularly the blades (fiberglass) , it is important to evaluate the impacts of eventual disposal. There are currently few options for recycling fiberglass blades and it is less expensive to dispose of them in the closest landfill. Although the disposal will most likely occur offsite of the current proposal, the long term environmental impacts need to be included in the EIS.
Individual	HAZ01 - 1 - General	Another topic to consider is the maintenance of the turbines - specifically the turbine blades. If these 120 foot long blades need replacing (a potential of 1200 total in this proposed project), how will the bad ones be disposed of? Will they go to the local landfill?
Individual	HAZ01 - 1 - General	Currently, wind turbine blades are not recyclable. Where and how are you going to dispose of unusable blades?
U.S. Environmental Protection Agency	HAZ01 - 1 - General	<p>As construction, operation and maintenance of the proposed project may result in direct, indirect, and cumulative impacts due to use of hazardous and non-hazardous materials, EPA recommends that the project DEIS address these impacts. Hazardous materials such as compressed gas, petroleum products, and others may be used and/or stored in the community. Although proper management is presumed to be safe, concerns remain about the possibility of accidents resulting in the release of toxic materials to the environment. Therefore, EPA recommends that the DEIS document for the project:</p> <p>Describe measures that will be taken to minimize the chances of accidental spills or release of pollutants in the environment, and emergency response measures that will be taken should an accident occur;</p> <p>Address the applicability of state and federal hazardous materials, pollution prevention, and solid waste requirements, and appropriate mitigation measures to prevent and minimize the generation of solid and hazardous materials; and</p> <p>Assess the need to prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) and provide information addressing this SPCC using resources on EPA web site.3</p>
Idaho Conservation League	HAZ01 - 1 - General	Construction and operations will require the transportation and storage of hazardous materials including diesel fuel. We look forward to reviewing the hazardous materials management plan as it is completed.
Individual	HHS01 - 1 - General	The above concerns as well as irritating sub-audible and hyper-audible noise along with irritating cyclic electrical vibrations are experienced by individuals near similar wind farms, though overlooked as affecting only a few . However, for the few, being subject to such a forced environment without weighted consideration in the approval processes of entities such as the Bureau of Land Management, who should be representing and considering the quality of life for those few, is somewhat abusive.
Individual	HHS01 - 1 - General	Excavation for foundations will leave large piles of fractured lava rock which invites all sorts of critters, rock chucks - hoary marmot, pack rats, voles, and snakes, if left alone. Those piles need to be crushed / processed.
Hidden Valley Organic Dairy Farm	HHS01 - 1 - General	<p>"Nine participants in the near group reported that they had been diagnosed with either depression or anxiety since the start of turbine operations, compared to none in the far group. Nine of the 38 participants in the near group reported that they had been prescribed new psychotropic medications since the start of turbine operations compared with three of 41 in the far group." (Hanning et al., 2012)</p> <p>This information is shocking and disturbing. Windmills have been reported to cause all sorts of health problems for people of various ages and different genders. In May 2013 another article titled Adverse health effects of industrial wind turbines was released by three Canadian doctors; Roy D. Jeffery, Carmen Krogh and Brett Horner. The introductory paragraph of this article states;</p>

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		<p>"Canadian family physicians can expect to see increasing numbers of rural patients reporting adverse effects from exposure to industrial wind turbines (IWTs). People who live or work in close proximity to IWTs have experienced symptoms that include decreased quality of life, annoyance, stress, sleep disturbance, headache, anxiety, depression, and cognitive dysfunction. Some have also felt anger, grief, or a sense of injustice. Suggested causes of symptoms include a combination of wind turbine noise, infrasound, dirty electricity, ground current, and shadow flicker. Family physicians should be aware that patients reporting adverse effects from IWTs might experience symptoms that are intense and pervasive and might feel further victimized by a lack of caregiver understanding." (Jeffery et al., 2013)</p> <p>By allowing the Lava Ridge Wind Project to continue, we are subjecting members of our community to these unhealthy and almost unlivable conditions.</p>
Hidden Valley Organic Dairy Farm	HHS01 - 1 - General	If turbines are, in fact, causing miscarriages and other reproductive problems in large animals, what could this mean for the health of pregnant women and women of child-bearing age living in close proximity to the turbines?" {Myklebust & Raftery, 2012)
Hidden Valley Organic Dairy Farm	HHS01 - 1 - General	We also need to consider the words that were previously quoted, if this is what windfarms do to the reproductive systems of animals, what would it do to women who are pregnant who live near the site of the turbines? Are we willing to risk the health of our babies and wives for a tax incentive?
Individual	HHS01 - 1 - General	We strongly object for numerous reasons: 3.Increased crime will escalate from the construction crews--drunk driving, burglaries and unsavory character. which puts us and our families at great risk.
Project Mutual Telephone	LAND01 - 1 - General	This specific area is very rural in nature and is currently serviced by recently acquired CBRS wireless frequencies via ACAM subsidies from the FCC with speed mandates and other requirements. PMT is concerned that the wind turbines will create interferences with our existing and future wireless radio paths to our existing customers and future customers.
SIRCOMM	LAND01 - 1 - General	<p>On May 3rd, 2021, SIRCOMM received a Land Mobile Emergency Services report, authored by Commsearch, prepared on behalf of Magic Valley Energy LLC.</p> <p>The original information provided in the BLM Notice, as well as the information provided in the Commsearch report, indicate the Project will be in two of the counties served by SIRCOMM: Jerome County and Lincoln County. Both reports indicate the Project will be near SIRCOMMs Dietrich Butte Site in Lincoln County, an area where SIRCOMM was granted a right-of-way by the BLM for the operation of a telecommunications tower in 1993. SIRCOMM also owns and/or operates several other telecommunication towers in the area not on property owned by the BLM. In particular, there is the Hansen Tower Site located in Twin Falls County and the Gooding Tower Site, located in Gooding County. Additionally, in order to enhance its coverage area to improve service for the public it serves, SIRCOMM is currently completing final steps to utilize the tower site located at Skeleton Butte, in Jerome County. These tower sites are all interconnected.</p> <p>SIRCOMM remains deeply concerned that the proposals by MVA may interfere with the integrity of SIRCOMMs operations in the region. While it is impossible at this early stage to completely identify all possible risks or problems the Project may cause for SIRCOMM, we once again identify and reiterate the following concerns:</p> <p>Interference with the radio transmission and reception pathways near Dietrich Butte.</p> <p>Interference with the transmission and reception pathways between the Dietrich, Hansen, and Gooding Tower Sites.</p> <p>Interference with the transmission and reception pathways between Dietrich Butte and Skeleton Butte.</p> <p>Interference with the transmission and reception pathways caused by the large equipment that will likely be utilized to construct the windmills proposed in the project.</p> <p>SIRCOMM recently completed a significant comprehensive project, at great expense, to improve the coverage of its telecommunication system based on the current conditions in the region. A project of the magnitude being proposed by MVE may place the future efficacy of this overhaul at risk.</p> <p>The statement below from the Commsearch report (Section 4-Recomendations, pg.8) cause us additional concern:</p> <p>4. Recommendations- In the event that a public safety entity believes its coverage has been compromised by the presence of the wind energy facility, it has many options to improve its signal coverage to the area through optimization of a nearby base station or even adding a repeater site. Utility towers, meteorological towers or even the turbine towers within the wind project area can serve as the platform for a base station or repeater site.</p> <p>The realization that coverage has been compromised would likely occur in the construction phase of the Project. Once compromise has been realized, efforts to repair the compromise may not be swift enough to avoid the disruption of emergency services to that region, which could impact human life and safety. The time and cost associated with optimizing a nearby base station, adding a repeater site to a utility tower, meteorological tower or turbine tower, can be lengthy, complex, and expensive. There also remains uncertainty as to the efficacy of these alternatives. And, if these things were required by the Project, SIRCOMM may not have the financial means to carry them out. It may therefore be appropriate to begin consideration and discussion about whether these potential costs should be part of overall Project expense.</p> <p>Included as an attachment with this letter, is a simple diagram showing the microwave pathways SIRCOMM is primarily concerned about. The Dietrich site serves as a back-up microwave system to our Jerome tower site. Should our microwave system in Jerome malfunction, the Dietrich site would then serve as our primary microwave simulcast system. Interference from any wind turbine structures at that point could prove disastrous.</p>
Idaho Military Division	LAND01 - 1 - General	<p>In reviewing the reports prepared for the Lave Ridge Wind Project concerning interference between the project and broadcasting and communications systems, it was noted that some items were overlooked.</p> <p>The items, thought the sites are located outside the Area of Interest, their paths cross over into this area.</p> <p>The services carried on these paths are vital as they service statewide emergency services, law enforcement, federal/state/county agency customers. Any interruption or degradation of signal would be detrimental and will not be allowed to happen.</p> <p>The call signs of the potentially affected microwave paths are: KT181 / KPL56 (Cottterel Jerome Butte), WNTJ611 / KPL56 (Mt Harrison Jerome Butte) and KPL56 / KML75 (Jerome Butte Notch Butte). (See image on next page)</p> <p>If, after review from it is determined by that these microwave paths will not be affected by the proposed project, these paths should be noted in case of future expansion</p>
U.S. Environmental Protection Agency	LAND01 - 1 - General	Address existing land use constraints in the project area, including power lines and other utility right-of-ways, floodplains, etc. and impacts on the Applicants ability to obtain construction and operating permits and licenses for this project;
Individual	LAND02 - 2 - Minerals	It is also not right that it will take away any mining claims in the area and any possible of locals being able to make any kind of private land claims.
Idaho Conservation League	LAND02 - 2 - Minerals	ICL supports the two-year segregation suspending subsurface mineral estate on 73,000 acres. This segregation should include locatable and leasable minerals as well as sand and gravel operations.
Individual	NOI01 - 1 - General	<p>Physiological experiments on humans have shown that noise of a moderate level acts via indirect pathway and has health outcomes similar to those caused by high noise exposures on the direct pathway. The indirect pathway starts with noise-induced disturbances of activities such as communication or sleep. Symptoms of wind-turbine syndrome might include headaches, sleep problems, night terrors, ringing in the ears, mood problems, concentration and memory problems, and issues with equilibrium, dizziness, and nausea. These health issues have been reported in residents with windmills up to two miles from homes. What programs will be in place to ensure that if health issues in communities arise due to the windmills they will be properly addressed?</p> <p>https://science.howstuffworks.com/environmental/green-science/wind-turbines-health.htm</p> <p>https://stories.usatodaynetwork.com/windfarms/in-your-own-words/</p>
Individual	NOI01 - 1 - General	I wanted to put my voice as a NEGATIVE vote for the development of this wind farm. It may appeal to some people to see those white turbines spinning in the air, but they don't have to live with their noise pollution,
Individual	NOI01 - 1 - General	Do not want this in this area! They are noisy
Individual	NOI01 - 1 - General	11. What is the noise created?
Individual	NOI01 - 1 - General	<p>2. Threat to land wildlife- (noise also the wind dries out land they graze on)</p> <p>3. The noise for surrounding residents (algorithms get disturbed to the human body-sleep disorders, headaches, anxiety, tinnitus)</p> <p>Also, Wind Turbines are pretty expensive if they don't work.</p>
National Park Service	NOI01 - 1 - General	Natural sounds are important for wildlife, wilderness, visitors, and cultural-historic events. Animals depend on hearing natural sounds for a range of activities including communication, finding food and avoiding predators. The presence of noise can reduce an animals ability to detect and therefore respond to important acoustic cues in its environment (McKenna et al. 2016). The direct and indirect consequences of noise can have cascading effects on ecosystem structure and function (Francis et al. 2013).
Hidden Valley Organic Dairy Farm	NOI01 - 1 - General	Windfarms can be detrimental to the health of wildlife, livestock, and people who live nearby. In 2013 a study was conducted by doctors Michael A Nissenbaum, Jeffery J Aramini, and Christopher D Hanning. The findings and conditions of this study were published in the scientific journal Noise and Health. This was an in-depth study that had multiple study groups. The final results of the study concluded that:

Commenter	Comment Code	Comment Text
		<p>"This study supports the conclusions of previous studies, which demonstrate a relationship between proximity to IWTs and the general adverse effect of 'annoyance', but differs in demonstrating clear dose-response relationships in important clinical indicators of health including sleep quality, daytime sleepiness, and mental health. The levels of sleep disruption and the daytime consequences of increased sleepiness, together with the impairment of mental health and the dose-response relationships observed in this study (distance from IWT vs. effect) strongly suggest that the noise from IWTs results in similar health impacts as other causes of excessive environmental noise.</p> <p>The degree of effect on sleep and health from IWT noise seems to be greater than that of other sources of environmental noise, such as, road, rail, and aircraft noise. Bray and James have argued that the commonly used noise metric of LAeq (averaged noise level adjusted to human hearing) is not appropriate for IWT noise, which contains relatively high levels of low frequency sound (LFN) and infrasound with impulsive characteristics. (14] This has led to an underestimation of the potential for adverse health effects of IWTs." (Hanning et al., 2012)</p> <p>From these results we learn that the noise caused by IWTs (Industrial Wind Turbines) have been underestimated due to the inappropriate use of noise monitoring equipment. Because of this ineffective way of measuring the level of sound that the IWTs make, the health effects have been grossly understated. This "annoyance" is far more than just a mere inconvenience. In this study it was also found that</p>
Individual	NOI01 - 1 - General	<p>Because vibrations of 20 Hertz and below are produced by turbine propellers. The taller the turbine, the faster the propeller blade because the wind currents are stronger at higher altitudes, but the faster the propeller blades the more the noise.</p> <p>There is no doubt MVE will find a consulting firm that will certify that the turbine noise will be below the threshold of human hearing at 20 Hertz. Please note that just because the sound is below human hearing does not mean the sound cannot be felt by the human body.</p> <p>The research on the danger of low frequency sound is still being studied.</p>
Individual	NOI01 - 1 - General	<p>One of the key special audible characteristics of wind farm sound is the amplitude modulation (AM) of the sound over time as the turbine blades are turning, which results in a rise and fall in wind farm loudness. This is usually characterized as a whooshwhooshwhoosh sound modulated at the blade-passing frequency (usually around 12 Hz). This sound is usually evident, to some extent, in all wind turbine sound due to the nature of the noise generation mechanism at the turbine blade. However, the extent (or level) of modulation, known as the modulation depth, can vary significantly depending on the environmental conditions, and some objective measure of the extent of amplitude modulation, and its acceptability, is required. Some simple objective measures for AM were documented in the early wind farm sound policies and standards, but there is generally a concern that these were not rigorously developed, and their relationship to the extent of annoyance has never been adequately demonstrated.</p> <p>An Australian committee recommends that wind farm operators be encouraged to continuously monitor wind turbine sound at some sensitive locations and be encouraged to incorporate these sound measurements as part of their SCADA systems. This sound data should be monitored by signal processing systems to detect unusual sounds such as tonality and excessive amplitude modulation.</p>
Individual	NOI01 - 1 - General	Years ago I attended a public tour of wind towers located in the foothills east of Idaho Falls. I observed that in addition to the obvious visual and physical presence of the towers, the rotating blades create considerable low frequency roaring sound. There may be some impact on wildlife habitat and bird migration.
U.S. Environmental Protection Agency	NOI01 - 1 - General	<p>Regarding potential noise impacts to receptors and biological resources, EPA recommends that the NEPA analysis:</p> <p>Evaluate decibel (dB) levels, the effects of noise levels on a variety of species, and effects on sensitive receptors, residences, recreational users, and property values. It is important to describe the timing, duration, and reoccurrence of noise as they may occur over multiple construction seasons;</p> <p>Identify in the noise impact assessment the significance threshold utilized in the impact assessment methodology. EPA identified a goal of 55 A-weighted decibels (dBA) for outdoor residential areas to fully protect the public health and welfare.4 For low-frequency sounds often associated with wind turbines, EPA encourages BLM to consider using C-weighted and/or A- weighted metrics;</p> <p>Compare noise impacts among alternatives and quantify the number of sensitive receptors that will be exposed for each alternative. This information may be useful to decision-makers and reveal opportunities to minimize impacts to the most affected receptors during micro-siting of WTGs; and</p> <p>Indicate mitigation measures which will lessen or avoid adverse noise impacts.</p> <p>The project may affect noise levels, resulting in potential health impacts. There is increasing evidence that noise impacts can have non-auditory health effects. A 2007 review article that summarizes studies from the National Library of Medicine database on the adverse health effects of noise notes that long- term physical health effects have been linked to noise effects related to sleep disturbances, stress, and increased blood pressure, and can increase cardiovascular disease risk.5 These effects begin to be seen with long-term daily exposure to noise levels above 65 dB or with acute exposure to noise above 80-85 dB.6 The World Health Organization recommends that, where noise is continuous, the equivalent sound pressure level should not exceed 30 dBA indoors if negative effects on sleep are to be avoided.7 When the noise is composed of a large proportion of low-frequency sounds, a still lower guideline value is recommended because low frequency noise can disturb rest and sleep even at low sound pressure levels. It is also relevant to mention that recent scientific studies have shown that some migratory birds will avoid excessively noisy areas during migration.8 This will need to be carefully considered since Idaho hosts many threatened and endangered migratory bird populations along their migration routes.</p>
Idaho Conservation League	NOI01 - 1 - General	The BLM and Magic Valley Energy/LS Power should take measurements to assess the existing baseline background noise levels at a series of locations and estimate the anticipated noise levels associated with the project as proposed. Based on this analysis, the project may need to incorporate additional design features to minimize adverse impacts to wildlife and the community.
Idaho Conservation League	NOI01 - 1 - General	The BLM should also describe how noise and dust related to blasting will be managed to avoid or minimize impacts to wildlife and community members. Seasonal and daily timing restrictions may be helpful in reducing conflicts.
Idaho Conservation League	NOI01 - 1 - General	If any rock crushing activities are permitted, the BLM should disclose the noise and dust effects and seek to minimize the impacts.
National Park Service	NPS01 - 1 - General	Looking northward from the Minidoka NHS Visitor Center, the open and expansive viewshed is a defining characteristic of parks historic integrity, related to setting, feeling, and association (Foundation Document, Minidoka National Historic Site). On clear days, visitors at Craters of the Moon NM&P can experience sweeping panoramas of color and texture stretching over the Snake River Plain with visibility extending well-over 100 miles in some circumstances.
National Park Service	NPS01 - 1 - General	Minidoka NHS sees close to 10,000 visitors annually and the park hosts an annual pilgrimage for former incarcerated Japanese Americans, their families, friends, and interested individuals. Craters of the Moon NM&P, with over 250,000 visitors last year alone, is a popular visitor destination for camping, solitude, natural quiet, and grand vistas. Concern: The NPS is concerned that this project could impact recreational access and the visitor experience by adding industrial-scale construction traffic in the vicinity of Craters of the Moon NM&P and Minidoka NHS. Truck traffic associated with the construction phase could present a safety hazard to park visitors and increase fugitive dust and noise within the area thereby temporarily impacting the visitor experience. Recommendation: The NPS recommends analysis of traffic impacts and noise levels that could occur due to ground-based construction traffic in the vicinity of Craters of the Moon NM&P and Minidoka
National Park Service	NPS01 - 1 - General	Minidoka NHS, Craters of the Moon NM&P, and the Oregon NHT are each nationally significant units of the National Park System. The Lava Ridge Wind Project has likely potential to impact the fundamental resources and park values of each of these units. Concern: The NPS is concerned about the projects potential impacts across a wide range of NPS resources and values and that with discussion of impacts in the NEPA document split across resources, the full effect to an individual NPS resource may be difficult to discern. Recommendation: The NPS requests that the NEPA document include a summary, in a single location, of all cultural, recreational, and ecological impacts to NPS resources and values for each of these three sites. We note that an assessment of impacts on Minidoka's values may be challenging to assess, quantify, and/or mitigate. Acknowledgement of these impacts is, nonetheless, necessary to include in both the draft Environmental Impact Statement and Section 106 Programmatic Agreement.
Individual	NPS01 - 1 - General	I love our National Parks (Americas Greatest Idea :). I am also a huge proponent of renewable energy - BUT - that development can't come at the expense of our natural resources. I hope you have the same concerns so that you make the best possible solution/decision regarding the Minidoka National Historic Site and Craters of the Moon National Monument and Preserve. I trust your review will include analysis of viewshed, light, noise, geology, hydrology, birds and wildlife, as well as the historic and cultural resources.
Individual	NPS01 - 1 - General	Third reason is that the site encroaches on a national monument, plus it will be an eye sore,
National Parks Conservation Association	NPS01 - 1 - General	As previously stated, the proposed project area is wedged between two national park sites. The project is proposed just two miles from Minidoka National Historical Site with turbines located on the footprint of the former incarceration site. Industrial energy development should not be sited in the center of protected lands, as it would have unacceptably high impacts on a large number of the resources and values of these lands. BLM must thoroughly document and analyze the potential impacts on nearby protected lands in this EIS and use that analysis to ultimately adopt a decision that does not authorize wind energy development that would adversely impact the resources and values of Craters of the Moon or Minidoka. The construction of an industrial site directly neighboring these national treasures will cause significant impacts to each of these units and will irreparably impair the very values these park units were designated to protect in perpetuity. The location for this project is inappropriate and the proximity to these parks creates high conflict surrounding this project. In addition to impacts to park resources, shared resources such as viewshed, wildlife, wildlife movement, migratory corridors, recreation, and cultural resources will be impacted and must be accounted for.
National Parks Conservation Association	NPS01 - 1 - General	BLM is required by NEPA and other applicable laws and regulations to analyze impacts to National Park Service and National Conservation Lands units from the proposed action. NEPA requires the agency to take a hard look at the impacts of the proposed project on nearby protected lands, including their protected resources, recreation and tourism. 40 C.F.R. 1502.16. At a minimum, BLM must consider the following direct, indirect and cumulative impacts in the EIS, all of which have a critical impact on the visitation experience: Viewshed analyses; Air quality analysis that includes the impact to the visitor experience from dust and pollution caused by transportation and traffic associated with development activities; Impacts to dark skies; and Noise impacts from operations.

Commenter	Comment Code	Comment Text
National Parks Conservation Association	NPS01 - 1 - General	To satisfy NEPA, BLM must actually explore how the proposed project would affect the visitor experience, including soundscape, night skies and visual setting, within these protected lands. This means answering key questions about impacts to Park and Monument resources, such as: How would the project affect night sky visibility from key and popular observation points? Would traffic associated with the project be audible or visible from popular visitor locations? What would be the air quality impacts on the protected areas from the project? How will development affect ambient sound levels in the protected areas? These are all important questions BLM must answer to inform its decisions on the proposed project and evaluation of the significance of the impact of the proposed project. To satisfy the hard look requirement, BLM must do more than recognize that certain types of impacts might exist it must actually explore those impacts. BLM can and should explore many of these impacts through modeling, which the agency regularly does when evaluating oil and gas development.
Individual	NPS01 - 1 - General	As a former resident of Ontario, Oregon with family who was incarcerated in Minidoka, I am writing to voice my opposition to the BLM plans for the massive wind farm. The view of the giant windmills and noise will be noticeable and intrusive on two treasured NPS sites in Idaho.
National Park Service	NPS02 - 2 - Craters of the Moon	Views from portions of Craters of the Moon NM&P could also be adversely affected by the project. Wind turbines would be visible from the western and southwestern sections of the park and potentially along the primary travel corridor to the headquarters area; viewshed analyses show 223 turbines (at maximum height) would be visible from these boundaries and would encompass 43 degrees of the 360-degree horizon. Additionally, other infrastructure such as substations with structures up to 75 feet high would introduce conspicuous new elements in the landscape with visual impacts.
National Park Service	NPS02 - 2 - Craters of the Moon	The western end of Craters of the Moon NM&P is very remote and undeveloped and is surrounded by undeveloped land. Project construction and operations proposed could introduce 381 miles of new roads, increasing human activity and the visibility of the area as a new destination. Concern: With increased commercial activity, a rise in OHV trespass and damage to cultural resources could be anticipated at the western end of the Craters of the Moon National Preserve. The park has minimal visitor support infrastructure in this part of the park, including no fee stations or water sources, and infrequent ranger patrols. Ground disturbance both from the construction project itself and from OHV use may bring new invasive plant infestations into the park, especially to the 500 kipukas, isolated islands of pristine and undisturbed vegetation communities interspersed between the lava flow. The park is not able to monitor for invasive plants on the western end. Recommendation: The NPS recommends using best available science to analyze probable increases in OHV damage and cultural resource threats with increased commercial and other activity in the area. The NPS recommends that the BLM and NPS partner to create a monitoring program that would identify and mitigate increased visitation patterns, OHV use or trespass, cultural and natural resource damage, and invasive plant populations in the western end of Craters of the Moon and surrounding BLM lands.
National Park Service	NPS02 - 2 - Craters of the Moon	Craters of the Moon NM&P contains one of the first designated wilderness areas in the national park system, the Craters of the Moon Wilderness Area, and possesses highly valued qualities of wilderness character including untrammelled, natural, and undeveloped areas with outstanding primitive and unconfined recreation, and unique scientific and educational opportunities. The night skies are integral to the wilderness character and park experience. The Craters of the Moon National Preserve also contains the Great Rift Wilderness Study area and other BLM identified areas in the vicinity of the project area that have wilderness characteristics (Craters of the Moon Lands with Wilderness Characteristics Inventory Summary Report, undated). Concern: The NPS is concerned about potential impacts of the proposed installation on wilderness character
Individual	NPS02 - 2 - Craters of the Moon	As a child, I visited Craters of the Moon and was fascinated by the landscape and the lava flows. The windmills would destroy the sense of the powerful upheaval of the earth centuries ago.
Individual	NPS03 - 3 - Minidoka NHS	I would like to submit my opposition to the construction of wind farms over the land of the Minidoka National Park site. This would be another example of disgrace to the people of Japanese ancestry! My great grandmother, grandfather, grandmother, mother and uncles were locked up in "camp" during the war. My mother and uncles were US citizens but they lost their rights because of the color of their skin and their heritage. Building a wind farm on sacred grounds is a further disgrace to their legacy! Please honor their sacrifice by allowing the Minidoka site to remain. Do not allow this construction to happen! The US has not done enough to protect this important history.
Individual	NPS03 - 3 - Minidoka NHS	My concerns with respect to the Magic Valley project relate to its potential impacts on the MNHS . As you may be aware, during World War II, almost 13,000 Japanese Americans were unjustly incarcerated at the Minidoka War Relocation Center (MWRC) from 1942 to 1945. Among those incarcerated were my father (Calvin Ninomiya), my aunt (Rose Masuda), and their parents (Kamesaku and Tetsu Ninomiya). The MWRC, like other Japanese-American incarceration centers, was intentionally placed by the U.S. Government in a remote and desolate location, far away from major centers of population. This isolated and forbidding setting was a defining characteristic of the MWRC to the thousands who were incarcerated there. Magic Valley's proposed project would effectively destroy this defining characteristic, dotting the landscape immediately surrounding the MNHS with hundreds of highly visible wind turbines, as well as associated energy transmission lines, roads, maintenance facilities, and other infrastructure. I last visited the MNHS in 2010. I can attest that the sense of isolation and remoteness experienced by my father and his family remains, and strongly evokes the conditions faced by those who were brought there against their will almost eight decades ago. It is essential both to honor the memory of those who were wrongfully imprisoned and to remind and educate current and future generations about that dark chapter in our nation's history.
Individual	NPS03 - 3 - Minidoka NHS	The erection of turbines for this project is unquestionably a visual eyesore and in this project, there are intentions to build on the Minidoka National Historic Site. These turbines and related equipment on and immediately surrounding this site would not only be a visual assault on every person that visits this site, but an offense to the memory and legacy of those Japanese Americans that were incarcerated in that camp. There is VERY little that remains of the original camp and the turbines will only detract from the original structures and the quality of the visitors' experience. The Bureau of Land Management's mission "is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations". Allowing turbines to be built on this site would certainly not provide 'enjoyment' to any visitors to this site or to anyone with relatives that were incarcerated there.
Individual	NPS03 - 3 - Minidoka NHS	When evaluating the impact of the project on the Minidoka National Historic site, keep in mind that the primary purpose of the site is preserving the history of the internment of Japanese citizens and incarceration of Japanese Americans at the site during World War II. Visitors primarily focus on the historic buildings and displays at the site and would not be adversely impacted by wind turbines located several miles away. The larger threat to the site would be a climate change driven wild fire destroying the historic structures rather than a wind turbine visible in the distance.
Individual	NPS03 - 3 - Minidoka NHS	Please honor the Minidoka National Monument as a testament to our human need to respect all our people by remembering our past mistakes. This would be yet another grave injustice. Relocating is an honorable action. Thank you in behalf of all Americans.
Individual	NPS03 - 3 - Minidoka NHS	I'm writing to express my disappointment and concern about the effects this project will have on the Minidoka historic site. Although in general I support alternative sources of energy, the effects this project will have on this historic site will be devastating. A few years ago I was able to visit Minidoka. As I walked around the site the significance of this site was overwhelming. The public needs to feel the historical significance of this camp. Changing the natural environment and landscapes will take away from the emotional impact of what it was really like for people to be forced to live there. Please, save this historic site and work toward preserving the Minidoka property and minimizing the view of wind turbines from inside Minidoka.
Individual	NPS03 - 3 - Minidoka NHS	I hope that, as you develop the Lava Ridge Wind Project, you will preserve the lands of the Minidoka camp in the service of respect, of honoring, of never forgetting the sacrifices that these quiet patriots made.
Individual	NPS03 - 3 - Minidoka NHS	As a historian and former Amache CO incarcerated, I am involved in efforts to preserve wartime concentration camp sites as a sign of endurance and survival during a time of heightened racism and hysteria. Minidoka, designated a historic site under the NPS, is an important educational site. But at present its identity, integrity, and value as a representation of our past is threatened by the Lava Wind Ridge Project. An increasing number of visitors -- not just Japanese Americans and camp survivor descendants -- are visiting concentration camps to learn about a painful past in relation to the present. Well-attended virtual tours were conducted this year due to the pandemic. It is certainly more than ironic that the Minidoka site -- a desolate area where dispossessed and dislocated Japanese Americans were isolated from the rest of the country during the war-- is now considered a valuable resource for the Lava Wind Ridge Project. So visitors are now going to gaze upon the spread of technology instead of responding to a remote environment that mirrored the forsaken feelings of wartime incarceratedees?
Individual	NPS03 - 3 - Minidoka NHS	I strongly oppose the Lava Ridge Wind Project. Minidoka is a historic site which should be left in its current historical condition and not marred by modern ugliness. My family has painful history at this site. I do not want to see it ruined by wind turbines destroying the memories that are important and necessary in America's past and for future generations. I ask that this project not continue.
Individual	NPS03 - 3 - Minidoka NHS	On page 57 of this report, you should at least recognize that this project will impair Minidoka National Historic Site. It will contradict the NPSs purpose of preserving the place and to educate the public about injustice at the hands of the federal government.
Individual	NPS03 - 3 - Minidoka NHS	I am against the installation of the Lava Ridge Wind Project. There are many historic properties and other cultural resources of interest that would be negatively affected by the Lava Ridge Wind Project. For example, one important concern is for nearby national parks, including Craters of the Moon and the Minidoka National Historic Site, the location of a World War II internment camp for Japanese Americans. Some of the turbines will be installed on the historic footprint of the Minidoka NHS and almost all are completely visible from the site. And overall, the Minidoka National Historic Site would be completely surrounded by the project. This is not right. The Japanese American community was already put into an American concentration camp by the government and now the government is trying to destroy one of the national monuments about this event - that is wrong. The wind turbine project endangers the Minidoka NHS site and I am against it.
Individual	NPS03 - 3 - Minidoka NHS	Please do NOT allow these ugly wind turbines to be built on the Minidoka National Historic Sites historic, natural and cultural site that portrays the history of the Japanese-Americans that were interned during World War 2.
Individual	NPS03 - 3 - Minidoka NHS	I don't see the Minidoka Camp outline marked to tell where the buffer area is between the project and the camp?

Commenter	Comment Code	Comment Text
		Is there data about the noise pollution the wind farm will make at the Minidoka camp as this will be a concern during out of state returnees to visit the camp?
Individual	NPS03 - 3 - Minidoka NHS	<p>As a third generation Japanese American whose grandparents and parents were incarcerated at Minidoka, I completely oppose the proposed installation of a wind farm near the grounds of the Minidoka Internment National Monument. The traumatic experience of Minidoka affected thousands of first and second generation Japanese Americans, and the current site is a stark reminder of lives drastically altered and changed forever. The stories of the unfair imprisonment of Japanese Americans must be told to educate those who remain unaware of the unjust loss of civil liberties that befell innocent US citizens.</p> <p>A forest of wind turbines on the land where thousands suffered incarceration will alter the physical landscape and negatively impact the historic grounds of the National Monument. It will be a visual blight and negatively affect former incarceratedees and others who come to learn and commemorate the time of inequality and race prejudice. The proposed wind farm would greatly diminish the importance and profound impact of the Minidoka experience and its powerful stories. It is critical that the site remains unblemished, so that every visitor can viscerally understand what happened during this dark chapter in American history.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I am all for green renewable energy but not when it affects the sanctity of a Historical site. The Minidoka Historical Site is not only important to the Japanese community but for the entire country as a reminder to never forget much like the 9/11 Memorial. Would you think it was okay to put something next to the 9/11 Memorial when there are other alternatives? I see in your report that you have considered multiple possible impacts of the wind turbines but don't mention the Japanese Internment Site once meaning you haven't even considered it. I hope that is an oversight and not intentional.</p> <p>Please consider this because you can move the wind turbines but you can't move where the Japanese were interned or move a Historical Site. Like 9/11 it is important for this country to respect these sites and to never forget.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The problem is that this project appears to overlap the traditional area of the Minidoka War Relocation Center on Hunt Road in Jerome. Also, it would be within eyesight of the Minidoka National Historic Center that currently sits in a smaller footprint from the original internment camp.</p> <p>The Minidoka National Historic Center is an area of pride among Japanese living in Idaho because it's a cultural symbol that shows how far Idaho, and the US, has come in discrimination again Asian Americans. It shows that the US, and Idaho, now welcomes Japanese nationals who want to live, work, and invest in Idaho. While Minidoka represents a historical blot on America's record of dealing with Japanese and Japanese Americans, the Minidoka National Historic Center has been seen as an active way the US is trying to correct that past and heal. It is a deeply important cultural symbol in Idaho, in the US and in Japan.</p> <p>Opening the historical grounds of Minidoka for this project would harm that trust. The project map shows that the project could be literally built on the graves of Japanese Americans buried in this area, many of which are still unmarked. No amount of reclamation could correct this damage once the project is over. This project would forever destroy an important part of Idaho's cultural history, if it's built to current plan.</p>
Individual	NPS03 - 3 - Minidoka NHS	Nowhere else in our nation would a massive wind farm be allowed close to a national monument. Can you imagine a similar wind farm being built on or near the fields of Gettysburg or on the Washington Mall? So, why is it OK to even consider building a wind farm near and on the Minidoka National Monument site? Please show the same respect to us that you do to other national monuments. There are other locations in the Magic Valley that would serve the same purpose.
Individual	NPS03 - 3 - Minidoka NHS	The scoping document fails to identify cultural resources/impacts for analysis. Located on and/or near the site of the Minidoka internment camp, to develop the proposed project without consideration for the historic significance of this site is why we have unfortunately continued to treat people as suspect due to their appearance. Please consider the impact of this project on the Japanese American community and the statement the development would make, burying the important message and legacy of the historic site.
Individual	NPS03 - 3 - Minidoka NHS	<p>I am generally in favor of green energy. I read that the windmills are visible from Minidoka. Do they create sound issues, traffic, wildlife or other issues on the site?</p> <p>Is there any flexibility in your proposal? Can some of the corridors be shortened?</p> <p>Does the proposed site include part of the original 33,000 acres of the incarceration camp?</p> <p>Are there plans to increase the size of MNHS to include more of the proposed windmill site?</p>
Individual	NPS03 - 3 - Minidoka NHS	The Minidoka national historic site - which is located within a couple of miles of this proposed wind farm - is a place to reflect and walk on the land that my grandparents were forced to live on for years. It's a place of trauma but also the only place we can physically go to reflect on the roots of family and generational impact as a result of the internment of people of Japanese descent. Most of the individuals who were interned have passed and this project will only further silence their voice and story. The Minidoka national historic site is the only site with original barracks, a baseball field that was so integral in camp life, and with a guard tower. The site has just built a visitor center to further educate visitors and make sure this experience is never forgotten. The addition of large wind turbines will be visible from the site, detract from the experience at Minidoka. The noise will also detract from visitors ability to reflect and take in the environment. This proposed project would only further silence the voices that can't speak. I highly oppose of this project.
Individual	NPS03 - 3 - Minidoka NHS	<p>The Minidoka National Historic Site is a site that is of utmost importance to preserve. In WWII the US government identified American Citizens with Japanese heritage and put them in camps to protect the greater population from the threat they posed during the war. The reasoning behind this policy was that despite their American citizenship, these Americans would support the Japanese war effort. They did not and some even served in the armed forces during WWII. When the war ended and the camps were discontinued many Japanese-Americans, regardless of where they came from, stayed in the agricultural areas that they were sent to. They had been taken from their homes, put in camps, and years later had to restart their lives. The historic site memorializes the history of the incarceration of Japanese-Americans in America. Here in Idaho, JACL preserves and passes down this history. It is only by remembering that we can seek to not repeat history.</p> <p>I am a Japanese-American and the preservation of this site is of utmost importance to me. While this wind farm may not encroach upon Minidoka, the close proximity of the wind turbines is hurtful to the people whose ancestors were incarcerated in this place. While I understand the importance of investing in new forms of energy and a connected electric system, if at all possible, I urge the BLM to reconsider its windfarm location.</p>
Individual	NPS03 - 3 - Minidoka NHS	However, in a letter from the National Park Service, it was noted that the Lava Ridge Wind Energy Project will involve construction of 400 individual towers at 740 tall each. For comparison, the Statute (sic) of Liberty is 305 feet, and the Seattle Space Needle is 605 feet. The turbine blades would exceed the wingspan of a Boeing 747. The expansive panorama of the night skies would also be affected by the light sources of the project. To plant these turbines in such close proximity to, and within the day and
Individual	NPS03 - 3 - Minidoka NHS	I am writing to express my concern over the proposed Lava Ridge Wind Project near the Minidoka National Historic Site. I feel that the proposed wind farm would overpower and irreparably damage the highly significant cultural, historical, and natural value of the Minidoka Site. I strongly urge you to not go forward with the proposed project. Thank you for your time and consideration.
Individual	NPS03 - 3 - Minidoka NHS	The construction of a vast wind energy site with its hundreds of 740 tall turbines, transmissions towers, service roads, etc. would fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS. Approaching the site and walking its grounds, visitors would no longer experience the feeling of a rural, undeveloped landscape recalling what Minidoka was like during World War II. Additionally, the night skies at Minidoka are integral to its cultural and historical fabric. The NPS is concerned that night skies will be impacted by light sources emanating from the project thereby altering visitors' experience and capacity to see the nightscapes experienced by those who lived at the camp during World War II.
Individual	NPS03 - 3 - Minidoka NHS	landscape of Wind towers will destroy for future visitors the reality of Minidoka's isolation; the misery of summer heat, and winter cold imposed on its residents . Viewing hundreds of wind turbines will devastate the emotional impact that Minidoka now provides visitors and must continue to provide in the future. The sound of four hundred wind turbines will destroy the quiet, reflective atmosphere needed to provide a learning and healing environment necessary in such a place.
Individual	NPS03 - 3 - Minidoka NHS	<p>This is a very important part of our country's history and understanding of World War II. We visited in 2019 and it was powerful to be in the place of the internment, something that cannot be replicated in a museum or building.</p> <p>Please consider impacts to the property and to access by visitors and preservation of the land currently and in the future.</p> <p>Thank you. Cara Kadoshima Vallier</p>
Individual	NPS03 - 3 - Minidoka NHS	I have just heard that the Minidoka Historic Site may be diminished in order to create a 400 wind turbine farm, proposed by the Magic Valley Energy Co. Please do not move forward with this proposal. The diminishing of the Minidoka site will erase an important part of American history that many people are unaware of. What happened to the Japanese Americans was an example of an injustice that was enforced by the government - and this should not happen again. This historic site will continue teaching visitors how the internment camp actually looked, which will create more empathy among others, and thus will create a positive environment/country.
Individual	NPS03 - 3 - Minidoka NHS	Though I truly believe wind farms are a key to our future, this is not the place for it. The primary reason is its proximity to the NPS site Minidoka National Historic Site and other properties that hold assets of importance from the WWII Minidoka Relocation Center.
Individual	NPS03 - 3 - Minidoka NHS	The VISUAL presence of the wind farm would drastically change the way that visitors see MIIN and thus change the story. So much of this land has been repurposed already. The dusty walkways between barracks are now fields of green crops. Adding an additional visual disturbance into the Minidoka experience de-centers the sites value for agriculture and industry.
Individual	NPS03 - 3 - Minidoka NHS	More importantly to me is the land that is not protected by NPS. There are artifacts and resources peppered all over the area near MIIN. I could take you to koi ponds and building footings and other remnants of the camp that are on other properties. Thankfully, many of the owners of these assets have left them in place. There are large portions of the proposed project that would interfere with these assets.
Individual	NPS03 - 3 - Minidoka NHS	Please do not destroy the Minidoka camp site. We need history preserved of what not to do!

Commenter	Comment Code	Comment Text
Individual	NPS03 - 3 - Minidoka NHS	The Lava Ridge project must consider the NPS Minidoka National Historic Site. We cannot afford to lose any more of the Minidoka site. Americans must have it so they do not lose this country's history and young people can learn that history. The incarceration of 120,000 blameless Japanese and Japanese-American people after the attack on Pearl Harbor, must be remembered. These folks, two thirds of whom were American born citizens were rounded up, never charged, and received no due process. We must preserve what is left of Minidoka and the other "camps" where all west coast Japanese and Japanese-American people were held to remind us of this racist and shameful behavior by our government.
Individual	NPS03 - 3 - Minidoka NHS	My family was in Camp Minidoka for two years. I do not want the Lava Ridge Wind Energy Project to hurt the Minidoka Historical Site. Perhaps they can find another area for their wind turbines.
Individual	NPS03 - 3 - Minidoka NHS	In regards to the proposed Lava Ridge wind farm, I trust you have the power to locate the farm in an area and way that will not disrespect and dishonor the Minidoka National Historic Site. I ask for your understanding and quest to find an alternative.
Individual	NPS03 - 3 - Minidoka NHS	The Lava Ridge Wind Project will fundamentally change the experience of visitors to the Minidoka National Historic Site. Pilgrimages by Japanese Americans and others to former concentration camps located in isolated landscapes provide an immersion experience into the isolation, powerlessness, and injustice felt by Japanese American incarceratedees. This connection to place provides a vital message to visitors that this should never happen again. If 400 wind turbines were allowed to dominate the landscape, it will not only affect the aesthetics of the site, but also change any opportunity for visitors to view the site as a place of contemplation and healing.
Bainbridge Island Japanese American Community	NPS03 - 3 - Minidoka NHS	<p>The Lava Ridge Wind project will permanently alter the place-based experience of this sacred site, by transforming the physical environment from a remote, high desert setting into an industrial scale wind farm. Minidoka's remote and isolated environment provides an immersive setting that is both historic and critical to the visitor experience. Ignoring the character and importance of the natural environment and altering the experience without thought to those who find this site uniquely important, would be yet another blow to the Japanese American community.</p> <p>BIJAC would like to voice our strong opposition to the Lava Ridge Wind project and request that our comments be included in the public record. Thank you for the opportunity to comment.</p>
Individual	NPS03 - 3 - Minidoka NHS	I am writing as a 20 year educator to oppose the Lava Ridge Wind Project that is being proposed on and near the Minidoka site. This site is of incredible historic significance. Building on or near it so that views of its original purpose are impacted denigrates their historic nature and steps on the backs of Japanese Americans who suffered greatly at Minidoka. It ruins countless educational opportunities for youth to learn about Minidoka first hand without a modern project in its midst.
Colorado Preservation, Inc.	NPS03 - 3 - Minidoka NHS	Based on our involvement and experience here in Colorado with the Granada Relocation Center (Amache), we are concerned with the impacts this project may have on the Minidoka National Historic Site. I have not had a chance to see the map and project proximity to Minidoka, but would have concerns about the visual and auditory impacts to the site and the visitor experience based on the large number or turbines proposed. Because of the nature of Minidoka's sensitive and traumatic history, it is important that visitors to the site are able to experience Minidoka in a way that is respectful to this difficult history and provides the greatest understanding of the environment especially as it was historically.
Individual	NPS03 - 3 - Minidoka NHS	The proposed presence of the Lava Ridge Wind Project within and adjacent to the footprint of the Minidoka camp boundaries has the potential to threaten areas already on, as well as potentially eligible for, the National Register of Historic Places. The government, in an action that the U.S. Civil Liberties Act of 1988 unequivocally declared was wrong, moved citizens and legal immigrants to a camp with only what they could carry, and evicted them with only the same. The archaeological traces of these experiences are fleeting, and archaeological preservation of the traces that remain are critical. Minidoka should be avoided entirely. If it cannot, I urge the BLM to require cultural resource survey work that acknowledges the unique nature of the camp and the possibility of subsurface deposits in cultivated fields.
Individual	NPS03 - 3 - Minidoka NHS	I am writing to you to ask for protection and preservation of the Minidoka Historic National Site in Hunt, Idaho. It has been brought to my attention that the Lava Wind Project is proposed to be constructed just two miles from the Minidoka Visitor Center. As someone connected to families who have been interned at this site, this brings me deep sadness.
Individual	NPS03 - 3 - Minidoka NHS	I am writing this to express my opposition to the building of the Lava Ridge Wind Project next to the Minidoka Historic National Site in Hunt Idaho.
Individual	NPS03 - 3 - Minidoka NHS	I am writing in opposition to placing the wind project on any of the footprint of the Minidoka historic site. This site should be preserved for future generations to learn and not repeat the same mistakes. Find a better place for this project not on a very important historical site.
Individual	NPS03 - 3 - Minidoka NHS	As a survivor/visitor of Minidoka NHS I am extremely concerned about the historical landscape of this painful reminder of our imprisonment, without due process of law. To change the landscape will erase the power of feeling isolated and disrespecting this historic site.
Individual	NPS03 - 3 - Minidoka NHS	<p>I am for renewable energy if our world is to survive without pollution and emission from greenhouse gases. I am for our environment using renewable sources of energy. I am for wind farms, but not placed near a sacred historical site. There is a visual impact on this land and I understand there will be turbines on the boundary of Minidoka as well as turbines being viewed from the Visitors Center.</p> <p>These hallowed grounds should be viewed and visited without the distraction or deterrence of hundreds of wind turbines being seen and heard.</p>
Individual	NPS03 - 3 - Minidoka NHS	I am writing to you to ask for protection and preservation of the Minidoka Historic National Site in Hunt, Idaho.
Individual	NPS03 - 3 - Minidoka NHS	<p>What impressed us the most were the feelings of desolation and isolation we sensed as we were bussed out to the Minidoka site, which stands in the middle of a dusty Idaho desert. Standing amidst the tumbleweeds and the dry earth in the scorching heat of the sun, our respect for the Issei and Nisei who were imprisoned there for 3-4 years was heightened. It was very important for us to actually experience those feelings of physical remoteness and emotional distance from all that is normal to truly acknowledge the extreme courage and perseverance of the internees.</p> <p>In the future, we hope to take several members of our extended family back to the Minidoka site so they too can personally contemplate and reflect on what life was like for our grandparents and parents during that time. We feel that the visible presence of hundreds of massive wind towers and adjoining facilities will detract and destroy from that experience. It is important to preserve the camp and its current surroundings for future generations. This will ensure that visitors are able to visualize and understand why injustice and racial profiling should never be tolerated.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I do believe in and support the move to renewable energy sources. However, the proposed wind farm project would fall within the historic footprint of the camp and dominate the landscape and views from the Minidoka National Historic Site. Renewable energy projects need to be done thoughtfully and minimize impact to surrounding communities including the Minidoka National Historic Site, and any Native American sacred lands.</p> <p>I observed a large wind farm while driving back from my two most recent Poston Concentration Camp Pilgrimages. Thankfully, they are not within view of the few remaining buildings that exist at Poston. However, the wind towers are like giant pinwheels, eye-catching and impossible to ignore. They become a focal point and pull one's attention from the rest of the landscape. The Lava Ridge Wind Project would destroy Minidoka's sense of isolation.</p> <p>Minidoka sits in a landscape that contributes to its story, the story of the people who endured and survived that place and history. Please think about the project's impact on Minidoka and the irreparable harm it would have on Minidoka's viewshed, the experience it offers visitors, pilgrims, and its descendants.</p>
Individual	NPS03 - 3 - Minidoka NHS	One of the directives of the BLM and the Environmental Impact of any project is its effect on the Socioeconomic and Social or "cultural" impact of any proposed projects. I strongly suggest that this proposed project negatively impacts the Minidoka National Historic Site which has been identified through the National Park Service as an important and critical area to preserve and protect for its historical significance to the country, Idaho and specifically to all Japanese Americans. I suggest that within the proposed boundaries noted in the project description that there are other less intrusive and impactful sites to locate this wind farm, specifically eastern Idaho where there is an abundance of open BLM land worthy of a wind farm that will not interfere with or negatively impact important historical sites.
Twin Falls Historic Preservation Commission	NPS03 - 3 - Minidoka NHS	Viewscapes at the Minidoka National Historic Site would be diminished by the widespread placement of wind turbines, transmission lines, etc. For the descendants of the more than 9000 Japanese Americans who were forced to live in this relocation camp during World War II, the site itself and the viewscapes are considered sacred. Japanese Americans make annual pilgrimages to Minidoka to pay respects to those who were imprisoned here. If wind turbines are erected as close as two miles away, the impacts on the historical and spiritual integrity of the site are immeasurable. Even distant views of the turbines would diminish the revered atmosphere of the National Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	I respectfully urge the BLM committee to decline the proposed wind project design as it is currently scoped. Although I am a proponent of seeking alternatives to fossil fuel energy, I have strong reservations about impacting the land on/around the Minidoka National Historic Site as this site has a profound personal impact on me and my family and deserves to be respected. I believe there must be alternatives to the project that can be found in partnership with those who seek to preserve the historical integrity of the Minidoka site.
Individual	NPS03 - 3 - Minidoka NHS	<p>I think the BLM should reconsider placing these turbines on the historic footprint of the Minidoka camp. I am hearing from my Japanese American colleagues and friends that are descendants of people that were incarcerated at Minidoka and they are saying they feel it dishonors their experiences. I believe them and feel it is important to preserve the camp as a reminder of the wrongs committed by the US government and as a site of healing for survivors and descendants today. It is also an important site to preserve for the purpose of teaching about what happened there.</p> <p>Please consider moving the project farther away from the Minidoka site</p>

Commenter	Comment Code	Comment Text
Individual	NPS03 - 3 - Minidoka NHS	I attended the Virtual Public Scoping Meeting on Thursday, September 9, 2021, and was concerned by the close proximity of the wind turbines to the Minidoka National Historic Site (MNHS). The visuals available at the time did not identify where the National Park Service site was located in relationship to the proposed wind turbines. Kasey Prestwich, project manager of the BLM Shoshone Field Office, emailed me a better map before the public comment deadline. From what I could tell, the wind turbines would meet the qualifications of a one mile buffer which is the required distance, but the wind turbines would be clearly visible from MNHS.
Individual	NPS03 - 3 - Minidoka NHS	I have also toured the Minidoka National Historic Site and fully support its mission and that of the Friends of Minidoka. We have an obligation to never forget that embarrassing moment in our nations and our state's history. That said, I understand that the closest wind turbine would be approximately 2 miles away from the site, and that the view shed from the site would show wind turbines off in the distance no taller than existing electrical transmission towers. Two miles is a long way away. Much closer than two miles from the site are commercial, dairy and light industrial facilities and operations. It is fitting and appropriate to protect the site and a reasonable distance beyond its border to honor those that were unjustly confined there. It is not reasonable to extend de facto the footprint of the site several miles beyond its actual border by prohibiting federal lands from also helping Idaho and the nation transition to a renewable energy economy. These two national goals honoring with reverence an important historical site, while moving to a carbon free economy can co-exist on the plains of southern Idaho.
Individual	NPS03 - 3 - Minidoka NHS	The Lava Ridge Wind Project, in its current proposal, would greatly alter the Minidoka experience. I strongly believe that Minidoka should not be compromised by development (even if the development is technically outside its borders) when it would impact Minidoka. With the potential to build hundreds of monumentally sized wind towers, the view shed and landscape would be completely altered. It is that uninterrupted landscape and desolation that provides the very context for the entire Minidoka experience.
Idaho Heritage Trust	NPS03 - 3 - Minidoka NHS	The Minidoka National Historic Site has been deemed nationally significant to American history and culture and it is imperative that it be preserved without visual intrusion from the largest proposed wind farm in the United States. The forced internment of more than 100,000 US citizens during WWII is already underrepresented in the annals of history. Marring the physical space that memorializes and interprets this dark time in our history does a disservice to the memory of Minidoka's survivors and their incredible courage in the face of grave injustice.
Japanese Cultural and Community Center of Washington	NPS03 - 3 - Minidoka NHS	According to the project description, the scale will be massive, cover large swaths of land and involve air space and vistas directly connected to the Minidoka National Historic Site. We believe that the integrity and setting of the Minidoka Site would be negatively and irrevocably impacted by this proposal. In addition, the proposed project would undoubtedly diminish the significance, interpretation, feelings and association of the historical site as it relates to the unjust incarceration of people of Japanese ancestry at Minidoka. The JCCCCW believes that the Lava Ridge Wind Project will adversely affect Minidoka through the introduction of undesirable visual, atmospheric and possibly audible elements that diminish the historic sites' significant features.
Japanese Cultural and Community Center of Washington	NPS03 - 3 - Minidoka NHS	The JCCCCW requests that the EIS include a finding that there is a potential for adverse effects and that consulting parties be brought together to develop and evaluate alternatives or modifications to the project to avoid or mitigate the potential adverse effects.
Individual	NPS03 - 3 - Minidoka NHS	Let me emphasize that I strongly support the statutory goal of the National Park Service to manage Minidoka unimpaired for the benefit of current and future generations. See: 16 U.S.C. Section 1. Based on my family's experience during the incarceration and my visits to the Historic Site for pilgrimages, I strongly endorse the NPSs goals to preserve the Sites fundamental resources and values, as outlined in the Historic Sitness Foundation Document: Environmental Setting: Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.
Individual	NPS03 - 3 - Minidoka NHS	Lava Ridge would change that spiritual connection with Minidoka forever and its statistics are staggering: 400 wind turbines as high as 740 feet tall, dwarfing the Washington Monument and the Seattle Space Needle. Not only would some of the turbines actually be built within the historic footprint of Minidoka, an estimated 340 of them would be permanently visible within the viewshed from the Minidoka Visitor Center. In 1942, the federal government encircled our camp with barbed wire. In 2021, BLM is being asked to encircle our sacred site with massive wind turbine towers and blades. Instead of being able to connect with the same lonely landscape that my mother had seen at her end, I would now be constantly distracted by massive twirling blades on an endless sea of turbines.
Individual	NPS03 - 3 - Minidoka NHS	That being said, I do not support diminishing the importance of the Minidoka National Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	I humbly beseech you to reconsider the idea of installing noisy wind turbines in the area of the Minidoka Camp site. Should not the site be maintained as a permanent place for solemn reflection ?
Individual	NPS03 - 3 - Minidoka NHS	I'm sure you would agree that installing 400 noisy wind turbines next to Auschwitz-Birkenau Memorial and Museum or at the Hiroshima Peace Memorial Park would seriously impede and undermine the intent of such sites for visitors to reflect, meditate, heal, and learn from the past. Please do not install 400 wind turbines at or near the Minidoka National Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	Minidoka continues to serve as a significant site for reflection and healing for former incarcerateds and their descendants. Many who were incarcerated at Minidoka have passed on, so this site also serves as a vital tool to amplify and share this hidden American history and connect the Japanese American incarceration experience to current social justice issues. Minidoka's remote location and vast landscape immerses visitors in the experience of the incarcerateds. The massive Lava Ridge Wind Project will greatly impact the environmental setting and experience for visitors, overbearing and essentially swallowing this site and its history. We are not against renewable energy. We ask that you consider another site for the Lava Ridge Wind Project, that won't destroy this sacred place of healing for our community and powerful educational tool for everyone. Having Minidoka protected and preserved and accessible for visitors is crucial to protecting and preserving American history.
Individual	NPS03 - 3 - Minidoka NHS	Ordinarily I would be supportive of renewable energy projects such as wind turbines. However, as an American whose taxes support national parks, I do not support the Lava Ridge wind farm near the Minidoka National Historic Site. It strikes me as unfortunate that an east coast entity wants to relegate Pacific Northwest history to simply a revenue generator for its stakeholders, ignoring the importance and relevance of this area, in conjunction with the Bainbridge Island Japanese American Exclusion Memorial.
Individual	NPS03 - 3 - Minidoka NHS	Looking at topographic maps of the area, there certainly seems to be large swaths of public land elsewhere in this area for this east coast based private equity firm to set up their wind farm. If we must use our public lands to allow private stakeholders to generate revenue by shipping power to other states, at least let us respect and honor this place and especially its meaning for Americans of Japanese descent and not treat it as expendable, as less than. In an era where anti-Asian sentiment has again gathered steam, lets fight against that by not allow-ing the Minidoka National Historic Site to be permanently altered. Let's not strip away dignity yet again.
Individual	NPS03 - 3 - Minidoka NHS	And to understand the meaning of that atrocity, we need to comprehend that the Minidoka National Historic Site is every bit as important as the Washington Monument. Would we consider it appropriate to erect 400 wind turbines next to the Washington Monument or place them on the front lawn of the White House? In Idaho there are vast desert areas where these wind turbines could be built. Please respect the importance of preserving the Minidoka National Historic Site as it is now, so that we and our children can learn and become worthy caretakers of this planet earth and all life on it.
Individual	NPS03 - 3 - Minidoka NHS	The proposed location of the wind project would adversely impact the Minidoka National Historic Site because: 1. The current views of open fields which currently remind visitors about the isolated and desolate location of Minidoka would be disrupted. 2. Seeing wind mills in full view of the Minidoka Historical Site would be disrespectful and would detract from the deep messages of injustice and racial prejudice.
Individual	NPS03 - 3 - Minidoka NHS	It is my sincere hope that the land surrounding this historic site be preserved so that the environmental integrity, historical authenticity and the immersive experiences may be maintained for the benefit of all Americans. This land is a vessel for our histories. This land is a time machine.
Individual	NPS03 - 3 - Minidoka NHS	I write to you with concerns over the environmental, social and cultural impacts of the Lava Ridge Wind Project on the Minidoka National Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	The remoteness of Minidoka (and other American concentration camps) is a fundamental part of its cultural history. Japanese Americans were rounded up and corralled into the most desolate, undeveloped parts of America. A wind farm project of the scale proposed by the Lava Ridge investors, with towers higher than the Space Needle in Seattle and turbine blades the width of a 747 airplane, would destroy the sense of isolation, cut off from civilization; that characterized Minidoka then and today. That is an important part of visitors experience, to understand and perceive first-hand what it was like to be expelled to a lonely, primitive place like the Minidoka concentration camp. And how, in spite of all the hardships, Japanese Americans relegated there managed to rebuild a temporary semblance of community, contribute to the war effort by producing food for Minidoka itself and other camps as well; how they endured and persevered in the inhospitable and isolated site.

Commenter	Comment Code	Comment Text
		So, I feel it is important that the Wind Farm turbines within the viewshed of the Minidoka Historical Site be re-sited in order to not affect the space that holds great meaning for Japanese Americans and all people who believe it is necessary to remember the past in order to not repeat it.
Individual	NPS03 - 3 - Minidoka NHS	But the overwhelming scale and proximity of the Lava Ridge Wind Project would negatively affect Minidoka as a meaningful historic and cultural site, and the lessons it preserves. The huge turbines should be located outside of the viewshed of Minidoka. I hope that smaller-scale projects, especially those that might be owned by indigenous tribes and local farmers (and using not only wind but also solar power) can take the place of the commercial mega-wind farm proposed by LS Power within the footprint of the Minidoka camp. The bottom line is that industrial-sized alternative energy projects can and should be developed in areas with less cultural and environmental impact and more direct benefit to users and local stakeholders, but the Minidoka Historic Site cannot. It is a unique and unmovable site that has great historical and cultural values that we must preserve as much as we must seek alternatives to our old habits of profligate burning of fossil fuels.
Individual	NPS03 - 3 - Minidoka NHS	In changing the landscape of the surrounding NPS site with windmills deters the naked reality of what occurred. Experiencing the site with one own senses including the visual starkness and barren plain, the quiet of only wind and dust allow contemplation of the injustice. Future generations of Americans must experience this desolation on site to hopefully prevent this ever happening again. Do not allow the Windmills to desecrate the historical impact.
Individual	NPS03 - 3 - Minidoka NHS	I am writing to respectfully request that Magic Valley Energy's proposed wind farm be required to maintain distance from the Minidoka Historical site to avoid both visual and audible impacts. The National Park Service (NPS) has stated that the towers "will fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS". As a Bainbridge Island resident, I am very familiar with the exclusion story and its legacy and the importance of Nidoto Nai Yoni, and feel it is imperative that the Minidoka site be protected.
Individual	NPS03 - 3 - Minidoka NHS	Please do not do this. I know two people descendants of concentration camp victims of this location. The Minidoka website explicitly explains how the preservation of the land is a part of healing generational trauma. I am petitioning against building developments on this land!!!!
Japanese American Citizens League Alaska Chapter	NPS03 - 3 - Minidoka NHS	All alternative locations for wind turbines should be considered. The wind farm can be moved; the Minidoka National Historic Site cannot.
Individual	NPS03 - 3 - Minidoka NHS	I believe we can help do that at Minidoka by keeping the area surrounding the camp site uninterrupted so that its vital history can be accurately preserved as it was when they volunteered - especially for those who did not return home. For this reason, keeping the desert surrounding Minidoka as desolate as it was in 1942 -1945 is important for the veterans and for all internees. Wind turbines that will surely destroy that setting - and history - must not be erected in view of and from the Minidoka internment site.
Individual	NPS03 - 3 - Minidoka NHS	I am fully supportive of the project, but not in the present form or location. Hopefully, it will be possible to develop in a place or manner that will not negatively detract from or minimize the purpose and intent of the Minidoka Museum which was supported by our elected national leaders, former internees in the Minidoka Internment camp, and other supporters.
Individual	NPS03 - 3 - Minidoka NHS	It is my request that we can serve the needs of both the Minidoka National Historic Site and the Lava Ridge Wind Project. I understand "changes to visual character and scenic quality due to the development and operation of the project" are subjects of the EIS. In that spirit, can there be some sound and visual impact studies that demonstrate how the Wind Project will affect the Minidoka NHS? Retaining some of the historic visual character of the Minidoka NHS is vital to its mission in informing what it felt like to those who were incarcerated there. I am hopeful that with such a study, the community can iterate and agree on a minimum acceptable distance between the two sites that achieves compromise.
Individual	NPS03 - 3 - Minidoka NHS	The impact of the project on the Minidoka National Historic Site must be taken into consideration. Minidoka must be preserved and protected to remind us of United States history; in this case very shameful history. I believe that mitigating the impact of the Lava Ridge Wind Project is possible, and must be done
Individual	NPS03 - 3 - Minidoka NHS	I just want to register my opposition to the wind farm project within the eye scope of Minidoka. Below is the link to my 2010 documentary BAMBOO AND BARBED WIRE about the yet, "un-excavated" burial grounds for the incarceration camp. It would seem imperative this project take precedence over the "scarring" of the literal, view of desolation that was imposed upon those who arrived at Minidoka as internees. This windmill project offers further proof that the United States does not take responsibility for its own history and legacy of racial discrimination. I give you full permission to share my film as further proof of why the wind farm should NOT be allowed within eye-sight of the National Park Service Site of Conscience. As the Winner of the 2021Governor's Award for the Idaho Arts for filmmaking and the publisher of www.IdaHomeMagazine.com (with 100,000 online readers) I intend to make the public aware of this further proposed indignation to the survivors of this tragic reality in American history.
Individual	NPS03 - 3 - Minidoka NHS	For these same reasons, my community work includes leading pilgrimages back to the Minidoka National Historic Site. By being on this sacred land together, we also seek to educate, to heal, and to remember with reverence and love what our ancestors endured. It is of utmost importance to these goals that the environmental setting of quiet isolation is preserved. When I was a child in middle school I asked my grandmothers to tell me about their time imprisoned at Minidoka. They could not share their complicated emotions with me but spoke vividly about what camp life entailed including the dust, the wind, the exceptional cold and heat, and moments thinking about freedom when seeing the birds of Idaho in flight. We must continue to protect the sanctity of the Minidoka National Historic Site so that future generations Americans can learn from this abhorrent mistake and work toward fulfilling the promises detailed in our constitutional language. We must continue to protect it so that my community can continue to heal and deeply understand the sacrifices that our ancestors made so that we might exist today.
Individual	NPS03 - 3 - Minidoka NHS	Renewable energy must grow and grow in a hurry, because climate change is here. But that doesn't mean that we must sacrifice our spiritual health in the process. Minidoka is an act of densho it must be passed onto the next generation to ensure its legacy is remembered, honored, and never repeated. That cannot be accomplished against the backdrop of a sea of towering wind turbines. Imagine placing those next to mass gravesite in Kosovo or near Gettysburg. This is not just land or a museum this is a sacred place of loss and pain. To tarnish its existence with a commercial energy enterprise is revealing in a time of reckoning with racial injustice . . . long have monied interests trumped the needs and cultural soul of minorities in this country. We must be better than that.
Individual	NPS03 - 3 - Minidoka NHS	By law, the National Park Service is required to manage the parks fundamental resources and values unimpaired for future generations. As stated in the Parks Foundation Document, these values include: *Environmental Setting: Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka. *Commemoration and Healing: Minidoka provides a place for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history. *Public Understanding, Education, and Involvement: Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today. LS Power, a New York private equity firm, is seeking BLM approval to build 400 wind towers as high as 740 feet tall just north of Minidoka, with several towers located on the historic footprint of the camp. Approximately 340 towers will be visible from the park on a clear day. They will form a visual wall of towers that will dominate about one-third of the parks 360-degree viewshed. Each of the towers could be taller than the Space Needle (604 feet). With turbine blades the length of the wingspan of a Boeing 747, each of the 340 towers visible from the park will create a visual impact equivalent to a 747 wing rotating on the Space Needle. The NPS has stated that the towers "will fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS."
Individual	NPS03 - 3 - Minidoka NHS	The historical Japanese World War two internment camp site will be damaged with all the above effects.
Individual	NPS03 - 3 - Minidoka NHS	The Lava Ridge Wind Project will significantly and negatively impact the Minidoka National Historical Site. As you are likely already well aware, this national park and historical monument acknowledges the injustice of U.S. Government actions against Japanese Americans in World War II. Minidoka serves several essential purposes for the Japanese American community-- namely it is a place for commemoration and healing. People, like my dear friend whose grandfather was interned at Minidoka, make pilgrimages here in an effort to feel a connection to their ancestors' experiences. Additionally, Minidoka ensures that for those not directly impacted by the internment of Japanese Americans during WWII there are resources to acknowledge and understand this painful part of our shared history. Minidoka provides educational resources and an immersive experience in just how isolating it was to be forced to live there. All of this-- the immersive experience, the educational opportunities, and the space to connect and heal, are at risk due to the Lava Ridge Wind Project. Based on its plans, these wind turbines will dramatically alter the environment surrounding Minidoka. It will make it hard to experience the sense of isolation and remoteness needed for true healing, learning, and commemoration. The approximately 340 towers would alter the environment, skyline, and surrounding traffic-- creating a visual impact that would change this sacred space forever.

Commenter	Comment Code	Comment Text
		When I spoke to my friend about her incredibly formative but painful visit to Minidoka she spoke at length about the visceral feeling the landscape provided her, bringing her closer to her grandfather's experience. In most cases, all that we have to remind us of our nation's painful history are monuments designed to convey the lived experience of those forced to endure it. It is essential that we preserve that experience for visitors to Minidoka and that can only be done if the Lava Ridge Wind Project is stopped.
National Park Service	NPS03 - 3 - Minidoka NHS	Minidoka NHS is a nationally significant site related to civil rights and liberties and American history. The site represents the exclusion and unjust incarceration experience of 13,000 Nikkei Japanese American citizens and legal residents of Japanese ancestry forcibly removed from their homes, businesses, and communities in the lush environments of the Pacific Coast (Washington, Oregon, California, and Alaska) and relocated to the isolated and remote high desert landscape of southern Idaho during World War II. Minidoka was listed in the National Register of Historic Places on August 18, 1979, and designated a unit of the national park system on January 17, 2001. The park currently preserves approximately 500 acres of the original 33,000-acre Minidoka War Relocation Center and offers opportunities for the public education and interpretation of the stories and lives of the individuals incarcerated there and its important civil rights lessons. The isolated inland setting embodied the perceived need to remove Japanese Americans from the West Coast and the expectation that security would be easier to enforce in an isolated location. This remote high desert and agrarian setting surrounding Minidoka NHS is a highly significant and a defining characteristic of the incarceration experience and is central to the parks historic integrity today. The original site included over 33,000 acres that the incarcerated Japanese Americans were expected to clear of sagebrush, irrigate, and bring into agricultural use for food production to support Minidoka's population and to develop the land for long-term homesteading and land reclamation. The Lava Ridge Wind Project has the potential to adversely affect the setting, feeling, and association of Minidoka NHS, three of the seven aspects of integrity of a historic property as defined by the National Register of Historic Places. The turbines would be taller than any existing structures in the State of Idaho and would dwarf all structures in the vicinity of Minidoka NHS. The turbines would encompass 114 degrees of the 360-degree horizon at the Minidoka Visitor Center and viewshed analyses indicate 324 of the proposed 400 turbines would be visible from the Minidoka Visitor Center (at the high end of turbine heights under consideration). These large-scale changes on the landscape could diminish if not prevent entirely the ability of the site to convey its historic character. Definitions of the seven aspects of integrity can be found in National Register Bulletin 15.Setting is the physical environment of a historic property. A central characteristic of Minidoka National Historic Sites integrity and historical significance is its setting in a remote and open expanse of agricultural fields northeast of Twin Falls, Idaho. The proposed Lava Ridge Wind Project and its accompanying field of towering, mechanical turbines could alter the open character and expansive views of this isolated agrarian location that compose the historic setting of the property. Feeling refers to a property's expression of the aesthetic or historic sense of a particular period of time and results from the presence of physical features that, taken together, convey the property's historic character. Today Minidoka NHS conveys feelings of isolation and abandonment, expressing a sense of the desolation experienced by Japanese Americans during the incarceration period. The feeling of the site evokes the victimization, injustice, and racism that are important aspects of the sites history. After the wind project is built, visitors to the historic site may no longer experience the feelings of wide-open spaces devoid of large-scale development characteristic of the incarceration period and agricultural and reclamation projects of the twentieth century. In this way, the presence of turbines, transmission towers, collection lines, battery storage facilities, maintenance facilities, and substations could impact the feeling of the site. Association is the direct link between an important historic event or person and a historic property. The site selection for the Minidoka Relocation Center directly links to association, as Minidoka met the War Relocation Authority's site selection criteria and was one of the earliest sites selected (Cultural Landscape Inventory, Page 37-38). The War Relocation Authority s criteria included large tracts of public land in remote locations away from strategic works that could provide year-round work opportunities. Other criteria included land available for agriculture, access to water, remoteness from population centers, and close proximity to railroads for shipment of materials and the Japanese American populations. The Lava Ridge Wind Project could adversely affect Minidoka NHSs ability to convey its association with: (1) the Japanese American incarceration experience; and (2) the sites contribution to southern Idaho's agricultural history and development. The openness and undeveloped landscape are vital to the historic character and purpose of Minidoka NHS. These defining characteristics: expansiveness, remoteness, high desert, and agrarian terrain, convey the governments site criteria and the long-lasting effects of that intentional decision-making process. The site still evokes vivid memories and strong emotions from Nikkei who were incarcerated there almost 80 years ago. Incarcerated Japanese Americans at Minidoka transformed the undeveloped arid land into irrigated agricultural fields characteristic of the area today. Following the closure of the Minidoka Relocation Center in 1945, the agricultural lands within and around the camp were subdivided into homesteads and auctioned off (Japanese Americans were excluded from participating in these land auctions). The transformation of the area to an emergent agricultural community was quick and efficient, as most of the lands had already been cleared during construction of the Relocation Center and then by incarcerated Japanese Americans for agricultural production. Minidoka NHS includes the property that was part of the Farm-in-a-Day initiative, a significant historical event that marked a cooperative effort between the local community, state and federal government, and the private agricultural industry to establish and demonstrate modern agricultural techniques and equipment. The event represents an important connection between the camp, how the land parcels were treated following the decommission of the camp, and the development of agriculture in southern Idaho. The visual and cultural intrusion of the wind project could fundamentally diminish the historic character of the landscape as undeveloped, open country that was intentionally chosen to separate Japanese Americans from the nation, and the rural agricultural landscape following the incarceration period.
National Park Service	NPS03 - 3 - Minidoka NHS	The NPS is concerned that the viewshed at popular visitor areas could be adversely impacted by the presence of turbines and associated infrastructure. Initial viewshed analyses completed by NPS using a digital elevation model indicate the vast majority of the proposed wind turbines would be visible from the Minidoka NHS Visitor Center, which is also a Key Observation Point (KOP). Over 80% of the turbines (324 turbines), spanning 114 degrees of the 360-degree horizon, would be visible from the park Visitor Center/KOP if turbines are selected at the high end of heights under consideration.
National Park Service	NPS03 - 3 - Minidoka NHS	Visitors come to parks to experience the natural quiet and the sounds of nature. Sounds associated with our cultural heritage teach us about the past, connecting us to a time and place in history. The quietness of Minidoka NHS, frequently described by incarcerated Japanese Americans as an unforgettable part of their experience, is integral to its cultural and historic fabric. Concern: The NPS is concerned that the project has potential to impact the soundscape as experienced by incarcerated Japanese Americans at the site during World War II. Industrial-scale construction activity, traffic, and blasting of the basalt substrate for over 400 infrastructure foundations would bring unprecedented noise levels to the area. Ongoing wind turbine operation would produce audible low- frequency noise throughout the 30-year life of the project. (Chiu & Lung, 2020).Recommendation: The NPS recommends that acoustic conditions be evaluated against the natural ambient sound level (Lnatural), defined as the sound level which would exist in an environment without contributions from human sources. NPS also requests blasting noise impacts be compared to Lnatural rather than existing conditions for both NPS units and the NPS Natural Sounds and Night Skies Division is available to assist with determining Lnatural.
Individual	NPS03 - 3 - Minidoka NHS	The construction of the wind farm with its huge towers with their turbines so near Minidoka will certainly drastically detract from the appearance of remoteness and isolation in that was seen 1942. For me the feeling of the camp is the combination of the isolation and remoteness, and feeling of despair back then reminds us that we should not let what happened to us happen again to others.
Hidden Valley Organic Dairy Farm	NPS03 - 3 - Minidoka NHS	Not only 15 miles from our dairy is the Minidoka National Historical Site in Hunt, Idaho. This site is home of a Japanese Internment camp that was operational around World War 2. People who were imprisoned there and their descendants as well are deeply offended by this project and strongly oppose the installation of wind turbines.
Individual	NPS03 - 3 - Minidoka NHS	This is why it is critical that the authenticity of Minidoka be preserved! Nothing should obstruct the site and change how future visitors view what the Japanese experienced, their story during their incarceration. Minidoka is just as much a part of our American history as the pilgrim's who landed on Plymouth Rock, the Alamo, Gettysburg, and the Twin Towers. These are historical sites that have stories of individual Americans who contributed to the fabric and history of our country. Stories that need to be told so we "the people" can understand, appreciate and acknowledge those people who helped build and make our country great now and for future generations.
Individual	NPS03 - 3 - Minidoka NHS	I want to make clear that I am very much in favor of renewable energy as we face the crisis of global warming. That is an issue that should be paramount for everyone including myself, but at the same time, I want to be sure that all other options for a site for the wind farm are explored. Thank you for listening to my appeal and understanding my desire to protect the Minidoka National Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	Today as US citizens of Japanese descent, my wife and I cannot knowingly allow any further desecration to any of these former incarceration sites without protest. Others should be allowed to visit these historic sites without the noise of wind turbines and the changed air flow they create. These sites are a place of healing and reflection for many of Japanese descent and a place of learning for many others. I am not surprised that wind turbines are being proposed to be located at Minidoka as it is remote and not willingly habitable by humans. BUT, since the US government forcibly placed anyone of Japanese descent, many of whom were US citizens, into concentration camps such as Minidoka, they should be preserved, as is, so that future generations of Japanese Americans and others who do not know the story of the Japanese American experience during WW II, can visit these sites in its natural environment and feel what those who were displaced there experienced.
Individual	NPS03 - 3 - Minidoka NHS	My wife and I strongly oppose advancing the Lava Ridge Wind project in the Minidoka region.
Individual	NPS03 - 3 - Minidoka NHS	This last summer, during our 50th class reunion, Janet Matsuoka Keegan took me on a tour of the National Minidoka Japanese Internment Historical Site. I had never been there before. We took time at the Visitor Center to read the personal stories, view the impactful video and walk out onto the observation platform. There you could look out across the baseball field into the barren, windy landscape and imagine boys playing baseball, running the bases, yelling and laughing. Looking toward the barracks, the sounds of mothers washing clothes, preparing meals for their block unit, using latrines, men standing around in their worn-out coats, filled my mind. Tears came to my eyes because I finally got it. My heart ached for these people and the terrible hardships that they were forced to endure. I put my arm around Janet and told her how proud I was of her and the years of dedication she put in to keeping their memory alive. Having wind turbines whirling and casting shadows across the land would be disrespectful and devalue the sacrifices to all those who passed through those gates. You would not allow them to be built next to a war memorial dedicated to all those who lost their lives in World Ward II. You would not allow them to build a Wind Farm outside the 9/11 memorial in Shanksville, Pennsylvania. You get my point. As a history teacher, I understand how important it is to remember and understand our mistakes as well as our successes. Especially, in these current times of historical truth deniers. Please do not build this Wind Farm next to this historically significant memorial.
Individual	NPS03 - 3 - Minidoka NHS	he wind turbines will be in close proximity to the Minidoka Relocation Center and will alter the visual and emotional impact to the visitors.
Individual	NPS03 - 3 - Minidoka NHS	LS power, a New York private equity firm, is seeking BLM approval to build 400 wind towers as high as 740 feet tall in Jerome, Idaho just north of Minidoka, with several towers located on the historic and sacred footprint of the camp. Approximately 340 towers will be visible from the park on a clear day. According to this proposal the towers will form a visual wall that will dominate one third of the Minidoka's 360 degree viewshed. Each of the towers could be taller than the Space Needle (604 feet), with wind turbine blades the length of the wingspan of a Boeing 747. Each of the 340 towers visible from the ark will create a visual impact equivalent to a 747 wing rotation on the Space Needle.

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		Surrounding this sacred site with hundreds of giant wind turbines will make it harder for me and my family to draw both strength and solace from annual pilgrimages. It will make it harder for us to connect with our Japanese American heritage and honor our ancestors who are no longer with us.
Individual	NPS03 - 3 - Minidoka NHS	If the Lava Ridge Wind Project moves forward and is built, it would forever change my experience at Minidoka. The National Park Service (NPS) has stated that the towers "will fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS." The land I would look out on in the future, wouldn't resemble the land my ancestors saw. The towers would dominate the landscape and inevitably the minds of anyone visiting Minidoka. This connection through generations would be lost. Rather than being immersed in the experience of this sacred ground, able to imagine what life would have been like during war, minds would wander to the imposing wind towers.
Individual	NPS03 - 3 - Minidoka NHS	<p>First, the National Park Service, included in its Mission, is to preserve the appearance of (the Viewshed) its sites for future generations to appreciate undeveloped. This must include some lands surrounding the Park Services Historical Sites, which includes the Minidoka National Historical Site. This open, barren land is an integral part of what actually occurred at that time and should be included to remain true to the Park Services Mission.</p> <p>I was surprised that there was no mention of the Minidoka Historic Site in the Lave Ridge Wind Project Plan of Development. Worse, the proposed footprint of the windmills is actually in the Historic Site plat! I'm sure no other Historic Site would allow this?</p> <p>Worse, with an estimated elevation of between 350-650 feet, the windmills will have a significant footprint, disrupting the horizons of the camp, even if they are only 350 feet tall. If they are taller, I used 500 feet for example, the visual pollution of 300-500 windmills will destroy the viewshed of Minidoka unless a very large buffer zone is required, the taller the windmills, the wider the buffer.</p> <p>Second, I am amazed at the background sound a windfarm can generate. The frequencies carry along the ground and become a constant buzzing. Residents that live around other large wind farms will corroborate this issue. Without adequate distance, a windfarm of the proposed scale must be evaluated for this issue and some consideration made for the residences. I am sure the National Park Service would not allow this kind of noise pollution for a site like Gettysburg or Grand Tetons?</p> <p>Third, the proposed site will be essentially a power station like American Falls Idaho on the Snake River. The power generation is dwarfed by the menagerie of wires, power poles, and lights. Besides the light pollution, the buzzing turbines, buzzing power lines, the spin up / spin down cycles, means the viewshed will be constantly polluted with sound, light, and motion. How is that supposed to help preserve the importance of the Minidoka Historical Site?</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>Thank you for the opportunity to submit comments to the Bureau of Land Management regarding LS Powers Lava Ridge Wind Project. The Minidoka National Historic Site has great meaning and importance to a very dear friend of oursher grandfather was a camp survivor. She had the opportunity to visit this sacred land. As a Japanese American, this experience was both painful while at the same time served as a source of strength and healing for her.</p> <p>The Minidoka National Historic site provides valuable and much needed educational opportunities for the public to understand the history of the incarceration of Japanese Americans during WWII and how protection of civil and constitutional rights is essential.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The proposed Lava Ridge Wind Project's impact to the protected Minidoka National Historic Site is so significant and will permanently negatively impact the landscape and setting of this site of conscience. The environmental a setting is essential to preserve the Minidoka experience. It's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives, hardships and isolation at Minidoka. These full and complicated histories and stories need to be accurately told and represented. It will NOT be, nor never can be again, if the Lava Ridge Wind project were to be approved in this location. This historic site is one of our nation's most important places of learning, remembrance and healing.</p> <p>Please do not move forward with this project.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>Please cancel plans to construct the Lava Ridge Wind Project adjacent to the Minidoka National Historic Site.</p> <p>Would you approve the construction of 400 wind energy turbines and up to seven new substations next to the Gettyburg Battlefield?</p> <p>Disney attempted to build such a theme park near the historic site and fortunately was defeated in their attempt to desecrate a national landmark after public opposition.</p> <p>For Japanese Americans, this callous disregard for our historic landscape at Minidoka feels the same. I object to the construction of an industrial-level project next to the sacred ground where more than 9,000 children, women and men of Japanese descent were stripped of their civil rights and incarcerated for years without charges, trial and due process during World War II.</p> <p>Do not desecrate this important historic space with an industrial park that will diminish the spirituality of this land where American citizens and permanent residents suffered. Do not further insult the memory of those who were born, died and suffered there because of the color of their skin.</p> <p>Thank you for upholding the sanctity of a crucial site in U.S. history.</p>
Individual	NPS03 - 3 - Minidoka NHS	If the wind farm were to be built as proposed, that feeling of reconciliation and resolve I experience at Minidoka would be transformed to more hurt and anger because it would forever disfigure the landscape, the view, and the pastoral quality of the site. It would transform a sacred place, a place of healing into an unsightly filed of enormous towers of steel, rotors, blades, maintenance roads, transmission lines, scar and forever damage the historical footprint of Minidoka and the treasures that lay beneath it. To add insult to injury, none of the power would benefit the citizens of southern Idaho. And, the United States government would have, again, with the stroke of a pen, allowed this egregious act to be inflicted on my people.
Wing Luke Museum	NPS03 - 3 - Minidoka NHS	<p>On behalf of the Wing Luke Museum of the Asian Pacific American Experiences, I am writing to provide public comment on the proposed Lava Ridge Wind Project, which will have significant impacts on the Minidoka National Historic Site.</p> <p>Around 2002, the Wing Luke Museum met with over 50 individuals who were formerly incarcerated at the Minidoka concentration camp during World War II over a series of 9 meetings to find out from them as a group what they desired at the Minidoka National Historic Site. We then provided comments on the General Management Plan for the site at that time (the page references below refer a draft version at that time). Their comments then speak powerfully now into considerations for what should happen to the environs and conditions at the site (at that time referred to as the Minidoka National Historic Monument):</p> <p>The unfertile barrenness and desolation of the historic period of the Minidoka concentration camp has changed dramatically to the present-day irrigated agricultural landscape. Former internees who have visited the site repeatedly mention that it is nearly unrecognizable the muddy ground and storms of dust that they endured at Minidoka have been replaced by thriving green farmland (notably a change that came from the work of their own hands). The NPS has the difficult job of maintaining the wide views and open environment of Minidoka perhaps best done by maintaining the agricultural environment (which also provides further interpretation opportunities) while also creating ways for visitors to experience Minidoka as former internees most vividly remember it as the dusty, barren, formidable, inhospitable environment it was. Balance between these two conditions must be given throughout the GMP/EIS, and efforts must be given at Minidoka Internment National Monument to share with visitors both aspects of the environment. Comments within the GMP/EIS on page 125 noting that for former internees, the area is often unrecognizable, as they associated the camp landscape more with desolation and barrenness than rolling green fields rightfully remind us that the current camp landscape can be deceptive from the actual environment faced by internees. The plan stated for Alternative B (page 163) and Alternative C (page 176) for selective restoration [to] highlight the open, stark, barren landscape first encountered by the internees is critical for the site and should also be included in Alternative D. Moreover, this selective restoration should also be mentioned in the Summary on page x, which currently only mentions protection of vegetation. Also, in the Education and Interpretation section of Planning Issues and Concerns (page 57), as the GMP/EIS makes mention of the challenge for the NPS to enable visitors to understand and appreciate the size of the original site, it should also make mention of the challenge to enable visitors to understand and appreciate the original and historically accurate environmental conditions endured by the internees. excerpted from comments submitted in 2005</p> <p>I put in bold comments from the former incarcerateds that relate to the proposed Wind Project. They specifically call for the maintenance of the wide views and open environment of Minidoka and the selective restoration [to] highlight the open, stark, barren landscape first encountered by the internees [sic]. From these comments, we see that it is both the land within the physical boundary of the site as well as the views beyond it that are of critical importance to the visitor experience, educational interpretation and historic preservation of the site.</p> <p>It is imperative that we listen to, elevate and honor the perspectives and desires of those most impacted by the World War II incarceration experience the former incarcerateds themselves. These comments speak directly to their desires at the site and speak strongly into the harmful impacts that the Wind Project would have, dishonoring their voices and experiences yet again and reflecting a failure to restore justice, degrading the work that so many have fought so hard to build for so many years.</p> <p>We call you to make a commitment to their original vision to expand the boundaries of the Minidoka National Historic Site rather than encroach upon it, to restore the environs and conditions to the open, stark, barren landscape that it once was, and to heighten interpretation to extend to the views beyond (whether through actual land or virtual media or a combination of both).</p> <p>The mission of the Wing Luke Museum is to connect everyone to the rich history, dynamic cultures and art of Asian Pacific Americans through vivid storytelling and inspiring experiences. The Wing Luke Museum is the only pan-Asian Pacific American museum in the nation, an affiliate of the Smithsonian Institution and an Affiliated Area of the National Park Service. We are nationally recognized for our community process, rooted in stewarding long-term relationships with community members, and deeply involved in connecting the past to the present with a vision towards the future. As such, we feel tremendous responsibility to carry forth the vision and perspectives of our community members, even when they have passed on. Indeed, in this case, we are fortunate to have their captured their perspectives on this present situation and are called all the more to carry them out.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I am submitting this letter as a descendant of a family imprisoned in an American Concentration Camp called Minidoka in southeast Idaho. As someone who has often visited the Minidoka National Historic Site, I am appalled at the thought of the Lava Ridge Wind Farm Project proposal.</p> <p>As one of the organizers of the Minidoka pilgrimage, I am familiar with the site and know the strong connection it has to my family and community. Unlike what happened almost 80 years ago, the community and survivors come back on their own terms. They pass on the stories of the prison camp where they were unjustly forced to live because of fear and race prejudice. The land holds sacred value and should be preserved as an educational resource without the harm that would be brought by the wind project proposal.</p>

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		<p>Since its designation as a National Monument in 2001, the Minidoka National Historic Site has attracted countless visitors to learn and experience the history of racial oppression that it represents. With the support of the National Park Service, Friends of Minidoka and the Minidoka Pilgrimage Planning Committee, the site has become a living history. To fully experience the site and recognize the pain, only the sounds of birds and nature should be heard among the tears.</p> <p>The additional noise of the wind project will not benefit the site or the experience. The visual of the towers spotted in the distance will not enhance anyones experience or help them understand what it was like to be an American in an American Concentration camp in WWII. It would be a travesty to lose this important aspect of American history. I ask that the Bureau of Land Management consider the detrimental impact of this project on the surrounding area and do not move forward with this proposal. There should be a thorough review and assessment on the impacts to resources and further comments should be allowed in virtual/online settings to accommodate the many survivors of Minidoka that are present throughout the world.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The National Park Service's Minidoka War Relocation Center or Hunt Camp would be threatened. This important historical site provides a place for educating the public in understanding the history of the incarceration of Japanese Americans during WWII. Visitors as well as family members of people incarcerated at this site can spend time reflecting on this dark time in history and this landscape in its current state can provide healing.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>Over the past ten years, I have had the privilege of attending the annual Minidoka National Historic Site Pilgrimage many times. As a white American who grew up just after World War II, these experiences have been invaluable to my understanding of American, and especially Pacific Northwest history and culture. What a treasure to all of us to have a living museum that captures and honors the real-life stories of unjustly incarcerated Japanese Americans, as well as the generational impact of the incarceration their families and communities. I am asking you to please prioritize protecting this history for all of us.</p> <p>One of the most powerful and educational experiences of being on the grounds of Minidoka is experiencing the isolation of the site. The expansive and desolate landscape brings home the reality of how far away these families were from everything they knew and how much resilience it took for them to survive such a horrifying ordeal. Please don't erase this history by erasing the landscape that played such a huge part in the experiences of those incarcerated.</p> <p>I am deeply concerned that by surrounding this sacred site with huge wind towers, along with all of foot traffic that goes with them, that Minidoka will be reduced to an entertainment park, when in fact it needs to be held as a revered monument to the lessons that we must learn as a country. Not only do we owe it to those incarcerated and their families to maintain this site as it has always stood, but we owe it to all of us to protect this site as the national museum that it is.</p> <p>Please protect the Minidoka National Historic Park and find an alternate location for the Lava Ridge Wind Project. Please protect this most precious of national monuments for all the generations to come who deserve to fully experience and understand this critical part of United States history.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I have been to the Minidoka area two times with a contingent of Japanese Americans from Seattle. The isolation, quiet and desolation are all very moving. Having a huge wind farm close by would ruin it for those trying to understand what their relatives dealt with while incarcerated there. Surely the wind farm could be moved farther away from Minidoka so that the peace and tranquility are not destroyed.</p> <p>The government chose very isolated areas to intern the Japanese Americans who then lived in abysmal circumstances. It is vitally important to preserve areas of our history whether they are positive or negative. Minidoka is an example along with all the other internment camps of a very negative experience for the Japanese American people forced to live there. I don't think it's too much to ask to preserve the sanctity of that area so that those wishing to visit it aren't distracted by a large wind farm. The Japanese Americans lost everything when they were interned; their homes, their pets, their cars, their belongings, their money, their jobs, their dreams and their dignity. It seems like a slap in the face for a corporate entity to desecrate an area that they hold important if only for historical perspective.</p> <p>It is my hope that the Bureau of Land Management will reconsider allowing a wind farm to be place near Minidoka</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I'm writing to request that the proposed Lava Ridge Wind Project not be approved. It will not only encroach on the Minidoka National Historic Site, it will also change the face of the landscape forever, including a large section of the National Parks System.</p> <p>My family was incarcerated at Minidoka for several years during WWII and I've yet to make the pilgrimage to the site to commemorate this. Public land has vastly shrunk in recent years this is a National Historic Site that means a great deal to many people for natural, historic and cultural reasons, so let's treat it as such and not develop this area.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>My family were residents at Minidoka during the war and this development does NOTHING to honor their sacrifice. It is bad enough that they were not given the respect or rights of white US Citizens by locking them up behind barbwire fences and having them sleep in horse stalls. What a disgrace! Please allow the grounds of Minidoka to remain as sacred property. This is important to keep the landmark so that this doesn't happen again!</p>
Seattle Chapter Japanese American Citizens League	NPS03 - 3 - Minidoka NHS	<p>Many of our members or their immediate family were forcibly removed from their homes during World War II and imprisoned at Minidoka without charge or trial. Some would spend the entirety of the war behind barbed wire in the Minidoka concentration camp. Others were granted leave but barred from returning to their homes on the West Coast until after wars end. And some young men left camp to fight for the US in the 442nd Regimental Combat Team and the Military Intelligence Service while their parents and family remained at Minidoka under armed guard.</p> <p>That history, and the memories and legacy emanating from it, is literally embodied in the site, the environment, and the viewshed that greeted our families on their arrival to Minidoka in 1942. This was a tragic episode in our nation's history, when Constitutional and human rights were sacrificed to claims of military necessity fueled by racism, wartime hysteria, and a failure of political leadership (findings of the Commission on Wartime Relocation and Internment of Civilians, published in Personal Justice Denied, 1982). It would only compound that tragedy for visitors experience of this national Civil Rights site to be diminished by the sight of 400 massive wind turbines that interrupt the view and intrude on the tranquility of this sacred place in American history.</p> <p>Minidoka National Monument was established in 2001 and declared a National Historic Site in 2008 as a site of historical importance, commemoration, and healing, where visitors can learn about the injustice of the wartime removal and incarceration of an entire community based solely on their ethnicity. It is a special place where people come to see, to learn, and to share, in some small measure, the experience facing Japanese Americans who were removed and detained by their own government so far from home. It is a space where we can look out at a lonely horizon and contemplate the lessons of our nation's past as we heal from individual and collective trauma. That space will be irreparably diminished -- emotionally, visually, physically by the intrusion of hundreds of massive wind turbines, transmission lines, power stations and roads next to the site.</p>
Idaho Falls Japanese American Citizens League	NPS03 - 3 - Minidoka NHS	<p>On behalf of the Idaho Falls Chapter of the Japanese American Citizens League, I am writing this letter to express my grave concern regarding the proposed Lava Wind Ridge Project and its significant negative effects on the Minidoka National Historic Site, a unit of the National Park System.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The Minidoka National Historic Site is sacred land to my friends and their families, and we ask that BLM to honor that. Established as a National Monument in 2001 and designated as a National Historic Site by Congress, the National Park unit acknowledges the injustice of U.S. Government actions against Japanese Americans in World War II.</p> <p>For over 20 years, the National Park Services stewardship of the site has served as a source of strength and healing for Japanese Americans and other people of color who have suffered injustice at the hands of our own government.</p> <p>Minidoka also provides educational opportunities for the public to learn that prejudice against the Asian American Pacific Islander (AAPI) communities is not new. It is part of a network of Japanese American camps and other sites of conscience, managed by the National Park Service (NPS) for the benefit of current and future generations. This space serves as a physical reminder of the prejudices the AAPI communities face.</p> <p>By law, the National Park Service is required to manage the parks fundamental resources and values unimpaired for future generations. As stated in the Parks Foundation Document, these values include:</p> <p>* Environmental Setting: Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.</p> <p>* Commemoration and Healing: Minidoka provides a place for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history.</p> <p>* Public Understanding, Education, and Involvement: Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today.</p> <p>LS Power, a New York private equity firm, is seeking BLM approval to build 400 wind towers as high as 740 feet tall just north of Minidoka, with several towers located on the historic footprint of the camp.</p> <p>Approximately 340 towers will be visible from the park on a clear day. They will form a visual wall of towers that will dominate about one third of the parks 360 degree viewshed. Each of the towers could be taller than the Space Needle (604 feet). With turbine blades the length of the wingspan of a Boeing 747, each of the 340 towers visible from the park will create a visual impact equivalent to a 747 wing rotating on the Space Needle.</p> <p>The NPS has stated that the towers "will fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS."</p> <p>By surrounding Minidoka with hundreds of giant wind turbines, the project would make it hard for visitors to draw strength and solace from annual pilgrimages. It will make it hard to experience that same sense of remoteness and isolation experience by Japanese Americans during World War II.</p> <p>It is completely unethical for these towers to be placed in a space that is sacred for a community that is already consistently sidelined and ignored as part of the story of America. AAPI people have sacrificed so much for America. Why must we keep taking more from them? Why is it always marginalized peoples that we ask for flexibility, again and again?</p> <p>There is a reason that this has been maintained as open space for the last 80 years. It was because the land is sacred. Please consider these peoples pleas to find other space for these towers. America is vast. Go elsewhere.</p>

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		<p>LS Powers proposal would dishonor our nations acknowledgment that the incarceration of Japanese Americans was wrong.</p> <p>It will destroy Minidoka's ability to commemorate ancestors and will destroy Minidoka's ability to serve as a place of healing and learning.</p> <p>It will desecrate sacred ground.</p> <p>Please, please do the right thing. You will protect sacred land. This is not the first time that something like this has been proposed, and LS Power can find other places to go.</p> <p>Thank you for your help and service in protecting this land.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>While I do not have personal family history connected to the Minidoka site, I have friends who do (their grandfather was interned in the camps) and I would like to show solidarity with their families by offering my comments here. I am opposed to the current proposal. This site is sacred ground, and it would be a tragedy to dishonor the lives of those lost and forever changed at this site. Minidoka should remain a place accessible to survivors and allies for healing and reflection. It would be a shame if this piece of American history were to be changed in such an irreparable way.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>LS Powers proposal would dishonor our nations acknowledgment that the incarceration of Japanese Americans was wrong. It will destroy Minidoka's ability to commemorate our parents and grandparents and serve as a place of healing and learning. It will desecrate sacred ground.</p> <p>Please consider this appeal to revisit the planning of LS Power's proposal as it stands - please choose another, better fitting location that does not dishonor our history and cause more pain to our Japanese siblings.</p>
Florin Chapter of the Japanese American Citizens League	NPS03 - 3 - Minidoka NHS	<p>I am writing on behalf of the Florin Chapter of the Japanese American Citizens League (JACL).</p> <p>We strongly oppose the proposed Lava Ridge Wind Project which would irreparably destroy sacred space of healing and learning for not only the Japanese American survivors, their descendants, but the public. This proposal is not unlike the solar array project in Owens Valley near the Manzanar WWII Concentration Camp that was taken off a priority list back in 2015 after concerns were raised.</p>
Florin Chapter of the Japanese American Citizens League	NPS03 - 3 - Minidoka NHS	<p>The plan to build 400 wind towers as high as 740 feet tall just north of Minidoka, with several towers located on the historic footprint of the camp which will fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS according to the National Park Service.</p> <p>Unlike the solemn view at the site now, the proposed 340 towers will be visible from the park on a clear day. They will form a visual wall of towers that will dominate about one third of the parks 360 degree viewshed. Each of the towers could be taller than the Space Needle (604 feet). With turbine blades the length of the wingspan of a Boeing 747, each of the 340 towers visible from the park will create a visual impact equivalent to a 747 wing rotating on the Space Needle.</p> <p>By surrounding Minidoka with hundreds of giant wind turbines, the project would make it hard for anyone, including survivors, their descendants, and others, to draw strength and solace from annual pilgrimages and visits. It will make it impossible to experience that same sense of remoteness and isolation experience by Japanese Americans confined in Minidoka during World War II.</p>
Individual	NPS03 - 3 - Minidoka NHS	The physical presence of wind towers, roadways, operations and maintenance facilities, increased traffic, and transmission lines would have a negative psychological effect on the visitors and would totally dominate the landscape.
Individual	NPS03 - 3 - Minidoka NHS	I strongly oppose the proposed Lava Ridge Wind Farm because it would drastically alter the visitor cultural experience and remoteness of the Minidoka National Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	<p>I am writing to you to ask for protection and preservation of the Minidoka Historic National Site in Hunt, Idaho. It has been brought to my attention that the Lava Wind Project is proposed to be constructed just two miles from the Minidoka Visitor Center.</p> <p>Minidoka is a site that represents our history that needs to be reckoned with. I am asking you to please consider halting the Lava Wind Project to preserve the land where my wife can maintain the connection to her grandfather and the resilience and grit that he was forced to grow. I would like to be able to visit this site and understand what he went through and how his trauma continues to impact how my wife walks in the world and how the world sees her.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The history of Japanese Americans on the west coast is a history forgotten in the textbooks throughout American education. This history includes the contributions of Japanese who brought knowledge of farming techniques, and skills in midwifery, carpentry, design, journalism, education, community leadership, philosophy and techniques in self sufficiency. These stated capture the vast Japanese immigrant pioneers contributions to build America. Their investment in family, home, community and place were great, but all was abruptly lost when the ravages of WWII, blame, and racism drove the military to subject over 120,000 Japanese and Japanese Americans to ten concentration camps throughout America. The Bill of Rights violated and history has continued to learn how fragile these rights are.</p> <p>An annual pilgrimage to Minidoka brings hundreds to this desert place to honor, remember and heal the deep generational trauma from loss of place and identify. Minidoka along with nine other concentration camps throughout America, remind all of America that our country's principles are fragile and in need of constant vigil. I know as my parents were married in Poston, Arizona Concentration Camp.</p> <p>The history of Japanese Americans should not compete with the economics framing environmental justice or energy addressing climate change. The 35 Japan towns along the west coast were places that held history, stories, culture and home. Minidoka is a sacred site and a site of consciousness. Minidoka is a Site of Shame. Do not alter a historic place that holds history and identity. Protect this place for our generations that follow us.</p>
Individual	NPS03 - 3 - Minidoka NHS	I'm writing today to respectfully ask that the placement of the Lava Ridge Wind farm, so close to the Minidoka National Historic Site, be reconsidered.
Individual	NPS03 - 3 - Minidoka NHS	Central to the experience of Minidoka is the sense of distance, emptiness and desolation that was experienced by those who were forced to live there during WWII. This experience would be fundamentally changed by the close proximity of the Lava Ridge Wind farm. I hope the placement and/or scope of this plan will be reconsidered.
Empty Chair Project	NPS03 - 3 - Minidoka NHS	> We understand that the Minidoka site could be diminished by the Magic Valley Energy's proposed construction of the largest wind farm in the United States. Their towering turbines within view of Minidoka National Historic site will certainly dishonor its significance for many generations. Although our country needs clean energy, we hope that the wind turbine proposal will be altered from its present plan in consultation with all the cultural, environmental, and historical entities that respect Minidoka's legacy.
Individual	NPS03 - 3 - Minidoka NHS	If this wind project were to proceed, I believe that it would destroy this very important aspect of the site. And Minidoka is very important to the Japanese American community. It is one of only four sites of incarceration that are maintained by the National Park Service. That means that it is much higher profile than sites like the one my family was in which is privately owned. The public looks specifically to National Park sites for preservation and education. Placing these large structures within sight of the property would ruin that and, to be honest, dishonor the memory of our ancestors who were held there almost 80 years ago.
Individual	NPS03 - 3 - Minidoka NHS	<p>The Minidoka National Historic Site is vital in educating the public about these under-taught American histories. We cannot live up to Americas promises without a full accounting of our mistakes.</p> <p>Please do not install the Lava Ridge Wind Project or any wind farm project at or near our sacred Minidoka National Historic Site.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The Minidoka National Historic Site is sacred land that is to be honored and remembered for future Americans and Japanese Americans specifically. I would like to see a continuation of healing available for future generations. This land is important in educating against future prejudice that the AAPI community has fought hard to earn back after such devastating injustice from our government.</p> <p>I believe this land should be available for healing, learning and remain a sacred ground untouched by private business.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The Minidoka National Historic Site and other sites of shame like it are vital in educating the public about these hidden and under-taught histories. We cannot live up to Americas promises of equality and equity without a full understanding of our mistakes. Please do not install the Lava Ridge Wind Project or any wind farm project at or near our sacred Minidoka National Historic Site.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I am writing with deep concerns about LS Powers Lava Ridge Wind Project and its devastating impact on the Minidoka National Historic Site.</p> <p>I am told that if the LS Power Wind Project goes forward it will dwarf the internment site. This is not right! It must not happen. The Minidoka National Historic Site needs to be preserved in its natural state without towering wind turbines nearby. Minidoka needs to be a place for engagement, reflection, and healing. We must never allow this brutal denial of rights to be perpetrated again. The Minidoka site and other Incarceration Sites can be used as a teaching classroom and a learning tool to ensure that these kinds of oppressive acts are never done to anyone again.</p>
Individual	NPS03 - 3 - Minidoka NHS	Please do not install the Lava Ridge Wind Project or any wind farm project at or near our sacred Minidoka National Historic Site. Allowing this project to move forward would be a major step backwards in the U.S. government's acknowledgement and official apology that the World War II mass incarceration of my family and community was wrong.
Individual	NPS03 - 3 - Minidoka NHS	Unlawful incarceration of Japanese Americans during World War II was a mistake of epic proportions and blatant violation of the United States Constitution, for which the United States government rightfully apologized in 1988. Today, however, we find ourselves in danger of repeating the mistakes of the past, as evidenced by a rise in prejudice and racism against the Muslim American community. Therefore, it is imperative that we not repeat our past missteps. The Minidoka National Historic Site plays a vital part in achieving

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		<p>this goal by educating the public on the history of the internment camps, and recreating the living conditions in the camps during their existence from 1942 to 1945. Of the 10 internment camps that existed, Minidoka holds personal meaning for our family, in that our mother was interned there as a young girl.</p> <p>I have learned that a large scale wind farm is proposed for the lands immediately surrounding the Minidoka site. The wind farm design calls for a multitude of massive windmill structures which will create constant high levels of noise and visual commotion. An important part of the educational experience of the Minidoka National Historic Site is the recreation of the sense of desolation and hopelessness that residents were forced to live with while in the camps. My concern is that construction of the wind farm so close to the site will seriously detract from that experience, and lessen the impact of the lessons to be learned from the illegal forcible relocation of American citizens.</p> <p>While an ardent supporter of the development of renewable energy resources, I ask that an exception be made in this case by considering alternate sites for the wind farm in order to preserve the integrity of the Minidoka experience and keep its memory alive.</p>
Japanese American Museum of Oregon	NPS03 - 3 - Minidoka NHS	<p>I would like to request that the Lava Ridge project not proceed in its current stated form. I think you will find that the human and environmental costs are too great and would irreparably damage the site that could not be compensated by the economic and electric power gain. I am concerned about this project for number of reasons. First, personally I am a descendant of those who were wrongfully incarcerated at Minidoka and I believe that the Minidoka site is culturally significant and memorializes those who suffer the indignities of racism and the denial of civil liberties. To have this power project within the visual and sound field of the Minidoka National Historic site is a direct insult and an act of erasure of Japanese American history. In addition to polluting the visual and audible serenity of the area I am also concerned about the impact of large scale construction on the environment and in turn its displacement of wildlife and human habitat.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I am writing concerning the potential impacts of the proposed Lava Ridge project on the Minidoka National Historic Site. Based on the information provided in the Scoping Handout and the Plan of Development, the project would create dramatic, adverse impacts to the National Historic Site by altering the visual environment and changing the feeling and association of the landscape of this important historic and cultural site. The potential for and magnitude of these impacts must be analyzed in the project's Environmental Impact Statement.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I am writing to ask that you reconsider the placement of the proposed wind turbines so as not to disturb it. It was preserved for a reason: America made a mistake of historic proportions there and caused deep lasting, suffering. It is a scar stained with racism.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>It is with all this background that I feel uniquely qualified to tell you that building a wind farm with 340 turbines within the viewshed of Minidoka National Historic Site is wrong and a direct affront to the Japanese American community. A community that has dealt with more than a year of escalating anti-Asian attacks in the wake of the COVID-19 pandemic.</p> <p>I support Secretary Haaland and President Bidens push for renewable energy. The extension of the production and investment tax credit (PTC/ITC) programs will incentivize renewables and push fossil fuels such as oil, coal, and natural gas out of competition and help meet our goals to combat climate change. I do not object to LS Powers development of a large wind energy project in Idaho. I understand the benefits of building projects on land owned by the Bureau of Land Management (with 400 wind turbines in other parts of the country, you could be dealing with 400 different landowners and negotiating leases with each of them individually.) I even understand that this location was likely chosen because of proximity to transmission lines and a favorable queue position with the regional transmission operator. But none of these reasons can justify the trauma it would cause survivors of the incarceration camps and their families to see development and modern business carrying on as normal within view of a place with such a troubled history. Our families did not ask to be sent to Minidoka, they were ordered under threat of legal action and punishment, and now the camps serve as landmarks for generations of Japanese Americans for years to come to visit and process their trauma.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>Five of the ten former internment camp sites have been preserved with the status of National Historic Site, Heritage Site, National Landmark, or National Monument including Minidoka. LS Power and the Bureau of Land Management may not have realized the impact this proposed wind farm would have on the surrounding area, in which case, I'd like to speak on behalf of the Japanese American community. What we want is for Minidoka National Historic Site be treated as such and be protected from the encroachment of large-scale industrial development. We hope the Bureau of Land Management will respect the sanctity of the site to the Japanese American community and not grant LS Power the use of this land.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I am writing to express my concern for the Lava Ridge Wind Project. Several of the turbines, as addressed in Section 1.3.1 of the Plan of Development, will be installed on the Minidoka National Historic Site. I am concerned about the historic and cultural considerations/implications in the turbine's proximity to this site. This site and surrounding lands are meaningful to so many Japanese Americans, including one of my close friends, whose grandfather was among those imprisoned at the Minidoka War Relocation Center.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The placement of these turbines will create both noise and visual pollution for visitors to these areas, many of whom have lineages that trace back to these important sites. We would not think of installing giant turbines near the Vietnam Veterans Memorial, or the Holocaust Memorial, and we should treat these other historic lands with the same respect.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The construction of the project will also cause traffic (obstructing folks from visiting this site), and additional noise, which will be very disruptive to the contemplative environment of Minidoka.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>There's no doubt that wind turbine farms are important as environmentally friendly energy sources. However, just as important are our historical and cultural heritage sites. I believe that with proper planning, the two can coexist in harmony.</p> <p>The proposed wind farm would be located adjacent to the Minidoka National Historical Site. The proximity of what would be the largest wind farm in the United States would directly threaten the integrity of this important historical site. The Minidoka site both educates the general public about a painful chapter in US history and hosts pilgrimages for the descendants of formerly incarcerated Japanese Americans. That mission would be severely hampered by the sights and sounds of 400 wind turbines next door.</p> <p>As the granddaughter of a Minidoka incarceree, I respectfully ask that you consider adding a substantial buffer of land between the Minidoka historical site and the wind farm. This would help protect the integrity of the historical site and its mission.</p> <p>Let's respect history while planning for the future.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>On my first arrival to Minidoka, with no one else on site, I was standing alone; softly gazing in the distance In the quiet, undisturbed moment I felt reverential and a connection. I could 'see' my Nisei mom and her brother strolling not far away as they might done seventy years before. The silence and the 'pure' surroundings were important in invoking that state of mind; an impactful and emotional experience for me. All my family stories and their memories of Minidoka became real to me in that moment. I walked away with a deeper felt meaning of the family and community history.</p> <p>Since then I have made donations of time and money to support public awareness of the World War Two massive confinement event in Japanese American history; and to memorialize the first and second generations of Japanese Americans who overcame very tough conditions and forces larger than them to have a successful immigrant experience in a land which has given them wonderful opportunities.</p> <p>I support keeping the Minidoka National Historic Site area and view scape a meditative place which supports reflection, contemplation and a unique experience. I do not support a wind turbine farm in that general area.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I'm writing to express my concern about the proposed Lava Ridge Project. I understand the plan calls for wind towers up to 740 feet tall and that several of them will be located within the view of the Minidoka Historic Site.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The National Park Service (NPS) cites the cultural landscape of Minidoka in 1942 with an oral history excerpt, When we first arrived here, we almost cried, and thought that this is the land God had forgotten. The vast expanse of nothing but sagebrush and dust, a landscape so alien to our eyes, and a desolate, weebegone feeling of being so far removed from home. The silence and desolation of the landscape of a concentration camp is what will be removed by the proposed project.</p> <p>The cultural landscape is a critical part of Minidoka's recognition as a national historic place representing significant civil liberties history in the United States (National Register Significance Criteria: A). It is an essential part of the history and the present-day setting, which is a place of continuing pilgrimage. The NPS explains, It is defined by a rolling plain of high desert sagebrush steppe punctuated by basalt outcroppings those landscape characteristics that contribute to the historic site include: natural systems, spatial organization, cluster arrangement, archeological resources, cultural traditions, circulation, buildings and structures, and vegetation.</p> <p>The proximity, activity, and height of the proposed structures of the Lava Ridge Wind Project will obliterate the historic and cultural landscape of the Minidoka National Historic Site. This constitutes a significant environmental impact and an environmental injustice, layered over historical civil liberties injustice. These are places of conscience, meant to be remembered for their isolated environments.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>While I have no issue with the wind project in itself, the use of or near the Minidoka Historical site preserving Japanese Internment Camp would be a disgrace to many Japanese Americans, including myself. The site seeks to educate and remind people of the forced relocation and even death due to harsh conditions, caused by fear and racism, that we should all attempt to eradicate. Clouding the view of the historical site degrades the educational value.</p> <p>Please consider an alternate location for the wind project.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>While I support the expansion of renewable energy sources, I ask that BLM find another location for this project. As a member of the Japanese American community, I am deeply connected to the sites of incarceration during WWII. Incarceration left and indelible mark on my family and my community and the powerful stories that Minidoka tells must be preserved. Futures were forever changed, generational opportunity and wealth lost. To truly understand the scope of incarceration, one must visit the physical space and marvel at the fact the camp became one of that largest "cities" in Idaho at the time. I would also be remiss to not mention the emotional connection that the physical sites have for descendants like myself. For many, it is the closest we will ever come to understanding our family's experience.</p> <p>It is imperative that we preserve these sites not to remember what occurred, preserve the history and name the atrocities committed so that they will not happen again as we move towards racial justice. Building this project on and so closely to historic Minidoka site completely disrupts the historical preservation and emotional connection to this site. Please do not let this project take that away.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The impact of Minidoka is more than just the boundaries of the camp and its buildings. Although the wind project will not be on the historical site of Minidoka, the surrounding land is just as important to the experience. The land shows the bleakness, isolation and remoteness thousands of citizens were forced to endure. Building the wind farm would negatively impact the landscape, thus altering the emotional impact of visiting Minidoka.</p>

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Individual	NPS03 - 3 - Minidoka NHS	The Minidoka Internment Camp, where thousands of Japanese-Americans were unjustly imprisoned during WWII, still echoes with the memories of pain, but also grace and stoic perseverance. The proposed presence of enormous wind turbines looming nearby would only belittle those heartbreaking and inspirational times.
Venice Japanese American Memorial Monument Committee	NPS03 - 3 - Minidoka NHS	The Venice Japanese American Memorial Monument Committee registers opposition to the Lava Ridge Wind Project, planned for an area close to the Minidoka National Historic Site in Idaho. The proposed 400 wind turbines represent one of the largest commercial wind energy facilities in the U. S. We hope the Magic Valley Energy LLC and the Bureau of Land Management, on whose 73,000 acres the turbines are to be placed, realize that the turbines will significantly and negatively impact the historic desolation and purposeful isolation of the Minidoka National Historic Site.
Minidoka Pilgrimage	NPS03 - 3 - Minidoka NHS	Stuck in the middle of nowhere, Minidoka is a painful reminder of what losing freedom looks like. If the largest wind turbine project in the country is built nearby, the Lava Ridge Wind Turbine Project will permanently dishonor this sacred ground. The visual wall of towers with spinning turbine blades will occupy almost a third of the park’s viewshed. The closest tower will be located within two miles of the new visitor center.
Individual	NPS03 - 3 - Minidoka NHS	I believe climate change is real and urgent and that all citizens will be called upon to make sacrifices for the greater good. I also believe that wind turbines are an appropriate response to the threats we are facing. It seems a small request/insistence that no wind turbines be placed within the Site footprint. Such action would reflect an appreciation and respect for the importance of this National Historic Site, its ongoing work and outreach, and the citizens who have played a critical role in its development and future.
Friends of Minidoka	NPS03 - 3 - Minidoka NHS	Through bipartisan legislation dating back 15 years, Congress has expressed its intent that the federal government manage Minidoka unimpaired as a nationally-significant site for learning, healing, and honoring the military service of Japanese Americans. In 2001, President Clinton established the Minidoka Internment National Monument as a unit of the National Park System, using the authority provided by the Antiquities Act. As required by the National Monument proclamation, the NPS engaged with the Japanese American community both on the West Coast and with local stakeholders to develop the parks GMP. In 2006, the NPS released the GMP and finalized it via a record of decision. ⁷ Park-Specific Authorizing Legislation. In 2008, Congress passed bipartisan legislation to implement the GMPs recommendations by expanding and redesignating Minidoka as a National Historic Site. The law required NPS to manage the Site consistent with the Organic Act, as amended. The Organic 8 Act requires NPS to manage fundamental resources and values unimpaired for the benefit of future generations. Through its management planning process, the NPS identified Minidoka’s fundamental resources and values through its General Management Plan (GMP) and Foundation Document. With regard to the park boundary and adjacent land, the GMP describes an interpretive theme to include: [t]he vastness, isolation, and open character of sites desert environment that existed during the historic period are maintained through collaborative partnerships and cooperative efforts with surrounding landowners and others. ⁹ The Final GMP identifies NPSs goals for Scenic Resource Management: The NPS will collaborate with neighboring landowners to assist in the protection of historically significant distant views to the surrounding areas. ¹⁰ During the GMP public comment period, the NPS found that [m]any of the respondents wanted to see the rural character and prominent landscape features of the surrounding landscape protected, particularly within the historic camp limits. Protection could be encouraged through cooperative agreements, such as conservation easements, conservation plans, and scenic conservation easements. The NPSs Record of Decision for the GMP states that [o]n site education and interpretation will be accomplished through a wide range of visitor experiences, including immersion into the historic scene, interaction with a variety of educational and interpretive media and personal services, and participation in creative and self-directed activities. ¹¹ The ROD also states that NPS will develop on-site interpretive exhibits including the reconstruction of the honor roll, guard tower, flag-pole, and barbed-wire fence. As part of its management planning process, the NPS also completed a Foundation Document, which states the parks fundamental resources and values including: Environmental Setting: Minidokas remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka. Commemoration and Healing: Minidoka provides a place for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history. Public Understanding, Education, and Involvement: Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today. ¹² In addition to the Organic Act, Minidoka’s authorizing legislation directs the Secretary to interpret the living conditions of the relocation centers. As noted above, an important interpretive ¹³ theme is to maintain the vastness, isolation, and open character of the sites desert environment that existed during the historic period. ¹⁴ Minidoka’s authorizing legislation also requires that Minidoka NHS shall be administered in accordance with the Historic Sites Act of 1935. ¹⁵ The Historic Sites Act states that it is a national policy to preserve for public use historic sites, buildings, and objects of national significance for the inspiration and benefit of the people of the United States.
Friends of Minidoka	NPS03 - 3 - Minidoka NHS	Southwest Intertie Project Legislative Realignment. In 2009, LS Power sought to build a 500 KV power line over the park entrance. Thanks to the leadership of then-Secretary Ken Salazar, the BLM worked with the NPS to relocate the line away from the park. In 2010, Congress passed legislation to approve the SWIP line relocation thereby showing its intent to protect the park from the negative visual impacts of a power line. ¹⁸
Friends of Minidoka	NPS03 - 3 - Minidoka NHS	5. RECOMMENDATION THAT BLM STUDY MEASURES TO PERMANENTLY PROTECT MINIDOKAS FUNDAMENTAL RESOURCES AND VALUES FROM LAVA RIDGE AND FUTURE THREATS. During the pre-planning process, we encourage BLM to consider affirmative protective measures to provide long-term protections for the parks visual and other resources. These measures could include: Land Use Plan Amendment. We encourage BLM to use its authority under FLPMA to consider protective measures on BLM lands located both within and outside the historic footprint of Minidoka. The Friends of Minidoka is prepared to work with BLM and other partners in BLMs land use planning process. Secretarial authority provided by the Japanese American Confinement Sites (JACS) Act of 2006. As noted above, Section 1(a) of Public Law 109-411 gives the Secretary of the Interiority authority to: create a program within the National Park Service to encourage, support, recognize, and work in partnership with Federal agencies for the purpose of protecting historic confinement sites, including the 33,000 acre historic footprint of Minidoka. In addition to the existing JACS grant program, we encourage the Secretary to direct NPS to expand the JACS program to include working with BLM and other partners to protect Minidoka and other former relocation centers, so that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nations commitment to equal justice under the law. ²¹ Minidoka National Register Nomination. As noted above, the U.S. Bureau of Reclamation, the former manager of the Minidoka site, prepared a National Register nomination to add a small portion of Minidoka to the National Register. Section 110 of the National Historic Preservation Act places an affirmative responsibility on federal agencies to manage and maintain historic properties under their jurisdiction or control. Furthermore, this section provides that historic properties not under agency jurisdiction or control but potentially affected by agency actions are to be fully considered in agency planning. Since BLM owns and manages lands both within and outside the historic camp footprint, it has an affirmative responsibility under Section 110 to determine the lands eligibility for listing through its association with Minidoka. Furthermore, while private ownership of portions of the landscape is a complicating factor, mixed ownership is not automatically disqualifying for listing on the National Register. As part of the current planning and consultation process, we ask that BLM assess the eligibility of the original 33,000-acre Minidoka landscape for listing on the National Register, in conjunction with its land use planning process for lands located outside of the historic footprint.
Individual	NPS03 - 3 - Minidoka NHS	Thoughtful attention and diligent analysis must consider the preservation of the Minidoka Victory Garden, Designed by Master Gardener Fujitaro Kubota. It is the exact location where Christian and Buddhist Gold Star Mothers and Fathers held ceremonies as they grieved their fallen. It remains a scared site. It requires your full attention and careful consideration.
Individual	NPS03 - 3 - Minidoka NHS	By law, the National Parks Service is required to manage its resources and hold up its values for generations to come. This is clear this is NOT the case with the proposed wind turbine farm. As a taxpayer and citizen, this really concerns me. It is abhorrent that the Bureau of Land Management is even considering a proposal to allow Lava Ridge Wind Project to be in full view of this historic site. With 400 wind turbines, it is going against the values of the NPS and will completely change the experience. Minidoka’s remote location provides an incredibly powerful immersive location with wide open fields to create a sense of isolation where Minidoka once stood. Place is powerful. The National Parks Service provides the public with that connection to many places of ecological, cultural, and historical significance including Minidoka National Historic Site. For twenty years, it has managed Minidoka to educate and engage the public in understanding this history. Much is at stake in our democracy when fear takes hold and the need to commit to our civil and human rights become even more essential. I implore you to reject the Lava Ridge Wind Proposal. This project will only repeat the history of harm. It is the right and just position.
National Parks Conservation Association	NPS03 - 3 - Minidoka NHS	Impacts to historic resources: Minidoka contains significant World War II internment camp history that could be impacted directly and indirectly by this project. We request analysis of all impacts to important historical locations connected to Minidoka.
National Parks Conservation Association	NPS03 - 3 - Minidoka NHS	Impacts to national park fundamental resources and values: Visual, noise, and dust impacts would harm the values of in each of the national park units. This project, as proposed, would diminish the quiet and solitude so many come to these remote parks to experience and that is written into their authorizing legislation. Specifically, the impact to survivors and descendants of Minidoka who come to the park to remember and heal from the racial injustice of this horrible time in our nation’s history. Minidokas Foundation Document states, Minidoka’s remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.
Bainbridge Island Japanese American Exclusion Memorial Association	NPS03 - 3 - Minidoka NHS	On behalf of the Bainbridge Island Japanese American Exclusion Memorial Association, on behalf of the 276 Bainbridge Islanders who were the first of the West Coast Japanese American community to be expelled from their homes and incarcerated at Minidoka in 1942, and on behalf of the countless Americans of all races and ages who use the lesson of this historic miscarriage of justice as a teaching tool in hope that the United States will not let a similar event happen again, we ask that you determine that the Lava Ridge Wind Project is wholly incompatible with the environmental, archaeological and cultural characteristics of the site. We ask that this project not be approved.
Bainbridge Island Japanese American Exclusion Memorial Association	NPS03 - 3 - Minidoka NHS	Minidoka was one of a number of similar sites around the U.S. Many of those sites now host annual pilgrimages. As the survivors of the incarceration experience pass away, the pilgrimages are increasingly made up of family members, teachers and students, and others attracted to this powerful story.
Oregon Physicians for Social Responsibility	NPS03 - 3 - Minidoka NHS	Our partners at the Portland Japanese American Citizens League and Japanese American Museum of Oregon have alerted us to their opposition to the siting of Magic Valley Energy’s Lava Ridge Wind Project on the historic footprint of the Minidoka National Historic Site and where almost all 400 turbines would be visible to visitors. The Minidoka National Historic Site is where thousands of Oregon residents of Japanese ancestry were unjustly imprisoned during World War II, and the preservation of this historic site is important for

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		all visitors to help us understand the chilling injustice, critical civil rights lessons, and to lift up the stories of the individuals forcibly removed and incarcerated there from 1942 to 1945. Part of the significance of the location that visitors still witness today is its remote and desolate location. We question whether the siting such a massive wind project where it is highly visible and detracting from the experience of this National Historic Site is appropriate.
Individual	NPS03 - 3 - Minidoka NHS	<p>I strongly support the work of the National Park Service to preserve Minidokas fundamental resources and values unimpaired for the benefit of future generations. I encourage BLM to develop alternatives that do not impair Minidokas important values, as defined by the National Park Service:</p> <p>Environmental Setting: Minidokas remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.</p> <p>Place for Commemoration and Healing: Minidoka provides a place for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history.</p> <p>Resource for Public Understanding, Education, and Involvement: Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today.</p> <p>It's very important to keep this historical site alive in order to teach others who don't know about the incarceration of innocent people. Minidoka is just as important to our country as Gettysburg and George Washington's home, two places I have been able to visit besides Minidoka.</p> <p>We NEED this special place for those families forced from their homes against their will. We also need it to show that people were strong and endured in that hostile environment where freedom was stripped from them.</p>
The Manzanar Committee	NPS03 - 3 - Minidoka NHS	<p>The Manzanar Committee opposes the Lava Ridge Wind Project proposed by the Bureau of Land Management. While we are in agreement with the Biden Administration that we need clean energy to reduce our collective carbon footprint on the planet, the Manzanar Committee believes that building the 400-unit wind turbine field would do irreparable harm to the Minidoka National Historic Site.</p> <p>The Manzanar Committee is dedicated to the preservation of the Manzanar National Historic Site and education around the World War II incarceration of Japanese Americans. A few years ago, a similar project to the Lava Ridge Wind Project was proposed at a site adjacent to Manzanar that would have provided solar energy to Los Angeles. While such projects are desperately needed to combat climate change, the Manzanar Committee and the surrounding community, including the local Paiute and Shoshone activists, objected to the project because it would have damaged their lands and ruined the educational and cultural benefits from visiting the Manzanar National Historic Site</p> <p>In our opinion, the Lava Ridge Wind Project will even have a greater negative impact on the Minidoka National Historic Site. Parts of the project will actually sit on land that was once part of the Minidoka concentration camp where thousands of Japanese Americans were incarcerated during World War II. To many Japanese Americans, Minidoka and other incarceration sites are tangible reminders of one of the most serious and painful contradictions of our country's philosophy of freedom. It is sacred ground that tells how over 110,000 loyal Americans were wrenched from their homes and forcibly detained without due process.it is a memorial to the suffering and remarkable courage of the Japanese Americans of that time. -the story of how a group of people can be imprisoned because of their race.</p> <p>Sites like Minidoka and Manzanar were created as National Historic Sites because the government understood the value of the site as an educational tool for all Americans. Please respect our story and the land and stop the Lava Ridge Wind Project.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I'm 90 years old, and a second generation Japanese American (Nisei), and was incarcerated in an American concentration camp during WWII when I was a girl. I A few years ago I had the privilege of attending the Minidoka Pilgrimage with my daughter and all of my grandchildren and I must say, it was a truly wonderful and healing and bonding experience for us all. The memories of pain and loss and unspeakable humiliation and shame came welling up. Being there with my grandchildren, sharing my stories, feeling their intense interest and love, being in a community of other survivors and families, walking the place that was once a concentration camp imprisoning families and is now a National Historic Site designed to educate the world about what happened to us, made me feel proud and humbled and loved and, well, like I belonged. I guess you'd say it was a healing experience.</p> <p>I'm very troubled to hear about the Lava Ridge Wind Project proposal. If built, the hundreds of towering wind turbines will dwarf the Minidoka National Historic Site and will block the expansive views, destroying the ambiance of isolation and remoteness that's part and parcel of the immersive Minidoka experience. This project will desecrate Minidoka as a pilgrimage site, hallowed ground for my family and community. It would be an absolute insult --a hurtful act that would make a mockery of the designation of Minidoka as a National Historic Site. Please do not allow the Lava Ridge Wind Project to destroy the Minidoka National Historic Site. My granddaughters continue to volunteer for the Minidoka Pilgrimage Planning Committee and I'm grateful for the meaning and friendships and sense of community they find there. I want my grandchildren and their grandchildren to know, not just the fact and figures about the Japanese American incarceration, but to understand in their hearts, what happened to us.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>With the historical backdrop of the forced incarceration of innocent Japanese Americans during World War II, it is morally imperative to protect the Minidoka National Historic Site. Its significance in the historical perspective and retrospective goes is paramount. Not only is this site a symbol of the injustice imposed on the Japanese Americans, it serves as a reminder that there are rights that need to be protected, which were not, to wit:</p> <ol style="list-style-type: none">1. The constitutional rights to life, liberty, and pursuit of happiness.2. The rights of due process as American citizens.3. Rights, which were wrongfully deprived before, during and after incarceration. <p>Moving forward to present day, the right thing to do is to continue to PROTECT the sacred site so the past is never forgotten.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>Minidoka National Historic Site has been preserved over the years for a reason. Its significance has no boundaries and to have this wind farm project proceed, would once again, take away from and deprive the very reasons why this historic site is here. The wind farm does not foster the sense of healing, peace and reverence or contribute to the educational and historical value of the Minidoka National Historic Site.</p> <p>I strongly urge you to consider the utmost significance of the Minidoka National Historic Site. Its physical site and all the intangibles connected to that site combine to cement its important position in history.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I'm writing to express my deep dismay at the prospect of the Lava Ridge Wind Project whose hundreds of very tall wind turbines will desecrate what I consider part of my family's and our Japanese American community's hallowed ground. The wind project as proposed, will destroy the expansive views, the quiet and sense of remoteness and isolation that are integral and essential to the immersive experience of the Minidoka National Historic Site. It will destroy Minidoka as a contemplative place for remembrance and healing. And, it will destroy the immersive educational experience offered by Minidoka for today's youth and future generations.</p> <p>I am a 3rd generation Japanese American (sansei) and my parents, grandparents, aunts and uncles were incarcerated in American concentration camps during WWII solely because of their Japanese ancestry. Through the decades I've come to understand and feel the multigenerational impacts of this trauma on my family and community. I've come to understand the self effacing way my parents walked through the world as related to them having been ripped from their homes, their schools, their friends, their communities and being forced to spend their formative adolescent years behind barbed wire solely because of their ancestry. I've also come to appreciate the way they went on to build a loving home and family and successful full lives as exemplary of tremendous inner strength and fortitude. Nonetheless, the deep emotional scars prevail and encouraging my parents to share their stories about the incarceration experience with my children, their grandchildren, has been profoundly healing for them and for me.</p> <p>For my family, participating in the Minidoka Pilgrimage is a pilgrimage in the truest sense of the word. It's a journey to a sacred place, our hallowed ground. To walk the dusty pathways, to visit the restored barracks and mess hall, to feel the hot breeze, to experience the remoteness and isolation of the place, while hearing stories of survivors nothing can replace this for deep healing and learning and community building.</p> <p>I very much support wind and other clean renewable energy sources as essential for addressing the climate crisis. I strongly urge the Bureau of Land Management to find another location for this wind power project where it won't desecrate our Japanese American family and community's sacred ground. I and my family look forward to future Minidoka Pilgrimages. Please do not allow the Lava Ridge Wind Power project to destroy this sacred place as an opportunity for learning, healing, remembrance, and building community. Once it's gone its gone forever.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>For over 20 years, the National Park Services stewardship of the site has served as a source of strength and healing for Japanese Americans and other people of color who have suffered injustice at the hands of our own government.</p> <p>Minidoka also provides educational opportunities for the public to learn that prejudice against the Asian American Pacific Islander (AAPI) communities is not new.</p> <p>It is part of a network of Japanese American camps and other sites of conscience, managed by the National Park Service (NPS) for the benefit of current and future generations.</p> <p>LS Powers proposal would dishonor our nations acknowledgment that the incarceration of Japanese Americans was wrong and will desecrate sacred ground. Please reconsider the project.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>During the COVID pandemic, antagonism against people of Asian descent has made headlines nationwide. Please do not destroy the site at Minidoka because it matters in racial harmony.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I am writing to oppose the close proximity of the Project to the Minidoka National Historic Site because it would significantly degrade the Minidoka experience for future visitors. More specifically, I hope that without the intrusion of the massive wind farm, my children, grandchildren, and great grandchildren will experience the quiet isolation and remoteness of the Minidoka National Historic Site and thus hear the soft whispers of the spirits that our family and others have left behind.</p>

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Individual	NPS03 - 3 - Minidoka NHS	<p>About 1910, my Japanese grandparents came to the United States to follow their dreams. My mother and three older brothers were born in the US. They and their extended families were interred at the Minidoka Interment Camp. Although, they rarely talked about their camp life, I did hear snippets of what it was like to be taken from their home in Portland, Oregon to Minidoka. I learned about their loss of home/business, racism and fear of the unknown that they suffered at a remote area that was hastily built. In 2018, the last member of my family that was sent there passed. I wish that I had asked more questions about their time in camp.</p> <p>A few years ago, I had the opportunity to visit the Minidoka Historical Site. Seeing it in person, brought to life the stories that I heard and those that I did not hear. My mother talked about the tower, the housing and how cold and windy it was. The day I visited was a cold windy day, and I felt how isolated the camp was. It was very moving for me to see my youngest uncles name on the Honor Roll wall. He died just 7 months before the end of WWII.</p> <p>I've seen the wind turbines along the Columbia Gorge that take away the spaciousness of that area. The proposed wind turbines on and near the site would extremely diminish the impact that future visitors would see and feel. It is disrespectful to all those whose lives were gravely impacted by the injustice of being incarcerated at this site. As racism rises in the US, keeping Minidoka as intact as possibly will remind and educate future generations that this never happens again. Please either downsize or move this project to another location in order to pay homage to the injustice that was done and preserve our history.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>am submitting these comments on the Lava Ridge project on behalf of myself, William Kito, as a descendant of the Kito family that was interned at the Minidoka Internment camp from 1942 to 1945.</p> <p>I believe that this project will severely impact the viewshed of the Minidoka NHS and the sense of remoteness that had a severe impact on those that were placed in these camps throughout the west. This remote location was intentional, if it was not they would have remained in more hospitable locations where they were initially gathered like Puyallup.</p> <p>With over 400 turbines up 750 ft. tall, some of which will be placed within the original site of the camp perimeter, and the associated transmission lines, this project will have a large impact on the viewshed of the National Historic Site. Given that the viewshed, particularly the vastness of the landscape around the camp, is one of the defining characteristic of the site and is mentioned in the draft Historic Landscape report, I expect that the BLM will engage in a constructive manner with the remaining prisoners that were placed in this camp or with there descendants to ensure that their concerns about the impacts this project will have on the Minidoka National Historic Site are addressed</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The history of Minidoka is unique and vital to our nation's history. During WWII, nearly 120,000 people of Japanese ethnicity were forcibly removed from the west coast and incarcerated without justification largely at ten American concentration camps of which Minidoka is one. Incarcerees at Minidoka came from the Pacific Northwest areas of the country including the states of Alaska, Washington, and Oregon. With its population of over 9,000, Minidoka was larger than all but seven cities in Idaho at the time. A key feature of the Minidoka site, as with all of the incarceration sites, is the remoteness and desolation. These sites were intentionally placed in the locations where they were because of the absence of much else nearby except for the train tracks upon which incarcerees were transported from their homes. Key to the experience of interpreting the experience of incarceration for historic preservation are the desolate vistas and geographic features of the surrounding area. In the National Park Services Long Range Interpretive Plan published in 2103, it notes The NPS will work with park neighbors, using the wide variety of resources available, to maintain and protect the integrity of the historic vistas and other historic elements related to the camp experience. NPS recognizes the importance of the historic viewshed to the interpretive experience as being just as important as the physical components of the Minidoka interpretive experience.</p> <p>Similarly, in the 2006 General Management Plan, NPS notes:</p> <p>Comprehensive cultural resource management practices will include the stewardship, protection, and preservation of historic elements such as landscape features, structures, buildings, and remnants of the historic circulation system. Research will continue to identify, evaluate, and document information related to Minidoka. Appropriate treatments for the cultural landscape are based on broad public support for the accurate depiction of living conditions in the camp, and more importantly, historic features that demonstrated confinement and loss of freedom, as well as features that reveal the Nikkeis responses to confinement. On a clear day one can see for over 20 miles around the Minidoka site. Completion of the Lava Ridge project will inevitably destroy the ability of the Minidoka site to effectively convey the sense of confinement and loss of freedom.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The integrity of the Minidoka National Historic Site location is being threatened by the proposal for a wind farm in the vicinity of the former internment camp. Unless we are willing to similarly locate wind farms near Civil War and other national historic sites, there is no conscionable reason for doing so with the Minidoka N.H. Site. Please, let's keep our national priorities in mind and not put financial gain above national historical integrity. Let's not have a wind farm within view distance of Minidoka or any other site of national historic importance.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I was born in February 1943 in the Minidoka Camp where my parents and other family members were incarcerated during World War II. What will be the optics of giant windmills surrounding or present near the Minidoka National Historic Site? The image this brings to me is frightening; the giant, white towers watching over the Minidoka memorial site offends me. 6. The efforts of Lava Ridge to harness wind energy should be taken ELSEWHERE, away from the Minidoka National Historic Site.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>On a personal level, my husband's family was incarcerated at Minidoka and I have been on two pilgrimages that were powerful experiences as we shared stories at the actual site. The feeling of stark remoteness and harsh natural conditions was clear and made it easier for me to understand the pain and suffering that my family and friends had to bear due to war hysteria, racism, and lack of government leadership.</p> <p>Stories told at Minidoka would be seriously compromised if the ambience of the area was interrupted by dozens of huge wind turbines surrounding the site.</p> <p>Impact of the Wind project</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The close proximity to the Hunt Internment Camp. Great efforts have been made to preserve a piece of Idaho's history that not many locations in the country have been able to. Although not a bright spot in our country's history, Idahoans have recognized the significance of keeping the memory of those Japanese Americans alive who lived, worked, and sacrificed for this country.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I urge the BLM to preserve the view shed so that visitors can reflect, heal and learn from the past absent the noise or obstructive view of large wind turbines.</p>
	NPS03 - 3 - Minidoka NHS	<p>It will forever DISTRACT and alter anyone's understanding of what happened at MINIDOKA. Part of my own pilgrimage there was to respect and recognize my family's horrific life-fracturing events. To see the bleakness, the hard lava ground, and know they were forced to be there, under guard, where even the rest rooms had no doors on the stalls, so that even that minor dignity was taken from them.</p> <p>But now, putting gigantic wind turbines there would change the focus, change the meaning of the history there and erase it, as if their lives didn't matter, signifying they never mattered.</p> <p>I ask that the MINIDOKA "RELOCATION CENTER"/National Historic Site NOT BE SURROUNDED by giant wind turbines, which would blow this history away like it never happened. The landscape IS part of why MINIDOKA was so hard. Are we not mature enough as a country to keep our history--all of it? Can we not teach and learn from such history? Please do not place these turbines there.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>Our family also visited Minidoka when it was an abandoned camp. In fact, we had a flat tire there. I could see how much it meant to my family to visit the camp although I had no idea their life there. Minidoka is an important historical site to the country and for Idaho. The present windmill plan obscures the significance of placing incarcerees in what was at that time a desolate and untitled land.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>In closing, I urge you to do whatever you can do to preserve the Minidoka National Historic Site as it stands today, and refrain from allowing development, albeit a clean energy installation, to physically encroach upon the Minidoka National Historic Site and thereby minimize its significance. I think you will agree that the sheer physical size and scale of the wind turbines would symbolically overpower the importance of this historical monument. For the sake of our children and future generations, please allow Minidoka to remain as it was in 1942a camp in the middle of a desolate region where Japanese-Americans persevered under extremely harsh conditions and, equally importantly, where our republic, our democracy and our constitution were put to the test.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>In order to not repeat history, we need to learn about it. It's important that when people visit Minidoka, they can experience some of what it was like for the Japanese Americans who were imprisoned there. The remote and isolated environment of Minidoka is integral to create an immersive experience, and building the wind farm would be very harmful to that.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>When I visit Minidoka, a visit not unlike a visit to the cemetery my mother and grandmother are interned, I expect the experience to be a time of quiet reflection and sadness. To go and see hundreds of huge monstrous ugly wind turbines rotating with lights flashing in unison would be a completely upsetting and perhaps even nauseous. Just the opposite of what would be expected at any National Historical Site.</p>
Tule Lake Committee	NPS03 - 3 - Minidoka NHS	<p>Today, the Minidoka National Historic Site is being preserved and interpreted by the National Park Service to ensure our nation will never forget this abject failure of democracy. Yet, despite Minidoka's significance, Magic Valley Energy LLC (MVE) inexplicably failed to consider the concentration camp as an environmentally sensitive and important site. Instead, MVE proposed wind turbines be located within the Minidoka Historic Site's viewshed, where they would be visible from, and encroach on the historic site. We support the goal of developing clean energy sources. However, we are bewildered by MVE's failure to recognize the negative impacts this massive wind project will have on the integrity of the Minidoka site. As proposed, MVE's Lava Ridge wind project is an incompatible development that threatens the integrity of an irreplaceable civil rights site. The project would destroy the setting, feeling and association of this American concentration camp.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I would like to address the dire issue that you perhaps are overlooking about these turbines that are being built and the location that is being chosen to construct these turbines so in solidarity with the Japanese community and as a product of the transatlantic slave trade myself and after being freed from slavery to be put into concentration camps as well I sympathize very deeply with the devastation of loss of community culture and roots and understand the importance of these sites and locations that hold the last remainder of Our Roots in this country I do hope you understand that this is not a cry out against clean energy being used this is about where you're deciding to put these turbines there's so much vast space in the state of Idaho where these could be located other than on or near a sacred site for people to pay homage to their ancestors in our modern world we have to work together to bring change and healing with all communities and it takes all people you acknowledging and deciding to build these turbines in another location shows your support for people's pain and allows people to have hope in you as a peoples</p>

Commenter	Comment Code	Comment Text
Individual	NPS03 - 3 - Minidoka NHS	During World War II, Minidoka was chosen by the Department of the Interior for its remote location, since it was a prison and because it was land that the Bureau of Reclamation was trying to convert into irrigated and farmable land. The Japanese American incarceratedees made it into usable land produced bumper crops and the surplus was sent to other camps. It is still a remote location to this day. Today, it is this remoteness and the rugged land that teaches the lessons of the past, that this should never happen again to anyone. This immersive setting is part of the historic preservation of this sacred space. If a 400 unit wind turbine field were built right next to it, it would permanently degrade this viewshed and the sense of desolation that the park has so carefully preserved and interpreted. At the same time it also lends itself to reflection and hopefully reconciliation for all who visit.
Individual	NPS03 - 3 - Minidoka NHS	Section 5.1.4 Cultural and Historic Resource Sites and Values of the Plan of Development states: MVE intends to conduct a detailed cultural resources investigation, 28 and is currently working to complete a Class I literature review/file search in order to identify any 29 newly or previously recorded cultural resources located in or near the Project Area. This does not acknowledge that 14 of the towers are on the historical footprint of the Minidoka WRA camp original site. It also may be referring to the land that the towers are placed on, but with no regard to the impact on the overall environment and the viewshed from locations at the Minidoka National Historic site and the Craters of the Moon National Monument and Reserve. Furthermore, it is written that the MVE may intend to conduct a detailed cultural resources investigation, I do not see any evidence of this intent yet. I have not heard any plans, so I am anxious.
Individual	NPS03 - 3 - Minidoka NHS	I am strongly against the current plan for the Lava Ridge Wind Farm placement because it desecrates the sacred land near Minidoka and ruins the feeling of isolation on site. Minidoka is a place where my family and community members faced serious hardship, forced onto them unconstitutionally by the United States government. The preservation of the site memorializes all that Japanese Americans lost because of the camps, from our American rights to a secure future. It is a solemn place that has seen some of the darkest days of American history. Placing a wind farm within eyesight of the site would be disrespectful to the uncertainty, dehumanization, and mental suffering that Japanese Americans had to go through at the hand of the U.S. government. Furthermore, the vastness of the desert around Minidoka allows visitors to feel first-hand the isolation and desolate nature of the site. It is necessary for visitors to be able to relate themselves to the confusion and fear Japanese Americans felt upon arrival to the unfamiliar location. Being able to understand why the incarceration was wrong will help ensure that history does not repeat itself and no other minority group is subject to the same injustice. It is important to remember America's pattern of detaining groups of people it deems a threat, solely on the basis of racism.
Individual	NPS03 - 3 - Minidoka NHS	Allowing LS Power to build their turbines so close to Minidoka will affect the cultural and historic impact of this National Historic Site. The noise of the turbines, the visual modernization of energy, will destroy the Minidoka current effect. Minidoka is isolated and stark, meant as punishment, as it was when the Japanese were interned. It is a blunt, vital physical and auditory reminder of the fragility of civil rights and cost to democracy when our constitutional rights are infringed upon. This should be remembered.
Idaho Conservation League	NPS03 - 3 - Minidoka NHS	We are particularly concerned about potential impacts to the Minidoka National Historic Site, located northeast of Twin Falls, Idaho. Minidoka was one of the isolated internment sites that held unjustly relocated and incarcerated Japanese Americans during World War II. Over 13,000 Japanese Americans were imprisoned at the site. Today, the National Park Service maintains the former camp as a memorial to those Americans of Japanese ancestry who were wrongfully incarcerated at the camp and as a reminder to our citizens of the injustice forced on so many through racial profiling, fear, and hatred. The visual impacts of the proposed Lava Ridge project to the Minidoka National Historic Site are likely significant, and may alter the nature and feeling visitors derive from the stark and isolated location. Retaining the open vistas allows visitors to better understand and connect to the daily lives at Minidoka, (Minidoka Foundation Document). In discussions with Friends of Minidoka, ICL staff learned about the importance of maintaining the feeling of isolation through Minidokas viewshed. This community hosts annual pilgrimages to the historic site to pay homage to survivors and descendants of incarceratedees. For many, maintaining the integrity of Minidoka is necessary to continue the remembrance of this civil rights violation and the resilience of the Japanese American community. The proposed Plan of Development includes wind turbines within just two miles of the Site and many within the original footprint of the 33,000 acre internment camp. At heights over 700 feet tall, these imposing structures, and associated electric lines, could dominate the viewshed for miles. This infrastructure could impact Minidoka visitors as they approach the site and attempt to experience the forced isolation that is part of the historical relevance of the site. The BLM should consider a range of alternatives that would avoid, minimize, and mitigate the impact to the Minidoka site.
Idaho Conservation League	NPS03 - 3 - Minidoka NHS	The BLM guidance on estimating nonmarket environmental values and analyzing those values in NEPA analysis was designated by IM 2013-131. This guidance directed the BLM to utilize estimates of non-market environmental values in NEPA analysis supporting planning and other decision-making. Nonmarket values are described as values that reflect the benefits individuals attribute to experiences of the environment, uses of natural resources, or the existence of particular ecological conditions that do not involve market transactions and therefore lack prices. We believe that these non-market values are important for understanding socio-cultural impacts, such as those associated with the Minidoka National Historic Site. A social preference survey would help the BLM and Magic Valley Energy/LS Power better understand the scope of the issue and the range of potential impacts to the historic site. We recommend the BLM conduct a social preference survey of a broad range of Japanese Americans on how project components in different alternatives would affect their individual experience and the integrity of Minidoka National Historic Site. See Martin-Lopez et al. 2012 for an example of a social preference survey methodology.
Individual	NPS03 - 3 - Minidoka NHS	While I support renewable energy, it shouldn't come at the expense of forever marring a cultural site like Minidoka. Didn't we do enough harm when we incarcerated our own citizens, Japanese Americans, during WWII? At the very least a comprehensive environmental analysis must be done to evaluate the cumulative impacts to both national park sites and the cultural values they contain. This review must include analysis of viewshed, light, noise, geology, hydrology, birds and wildlife, as well as the historic and cultural resources.
Individual	NPS03 - 3 - Minidoka NHS	In addition, consideration of this project is a huge insult to our Japanese American population. In an era where great deference is shown to every other minority, you have chosen to endorse a project that would have a very negative impact on this particular group of Americans. Shame on you for even thinking of ruining this area so close to the internment camps. You may not understand the meaning this has for others, but you can respect it nevertheless - or educate yourself.
Individual	NPS03 - 3 - Minidoka NHS	Please reconsider your decision to place the turbines so close to the Minidoka site. The noise level and dust will prohibit the visitors from enjoying their visit.
Individual	NPS03 - 3 - Minidoka NHS	I believe that this project will severely impact the viewshed of the Minidoka NHS and the sense of remoteness that had a severe impact on those that were placed in these camps throughout the west. This remote location was intentional, if it was not they would have remained in more hospitable locations where they were initially gathered like Puyallup. With over 400 turbines up 750 ft. tall, some of which will be placed within the original site of the camp perimeter, and the associated transmission lines, this project will have a large impact on the viewshed of the National Historic Site. Given that the viewshed, particularly the vastness of the landscape around the camp, is one of the defining characteristic of the site and is mentioned in the draft Historic Landscape report, I expect that the BLM will engage in a constructive manner with the remaining prisoners that were placed in this camp or with there descendants to ensure that their concerns about the impacts this project will have on the Minidoka National Historic Site are addressed.
Individual	NPS03 - 3 - Minidoka NHS	Please consider the impact of this development, and how it speaks to our families years of mistreatment, isolation and trauma. Appropriate spaces for this project exist that are not haunted by these atrocities. It is inconceivable that a proposal like this would be considered in proximity to other sacred historical sites. Is this location of less importance because of our nations ignorance to this abuse? Internment cost my family their homes, livelihood, and belongings, but most importantly their humanity, dignity, and freedom.
Individual	NPS03 - 3 - Minidoka NHS	The Minidoka National Historic Site is an important place that serves as a source of inspiration and education for future generations. Please honor and protect this place where over 13,000 Japanese and Japanese Americans lived behind barbed wire fences as the 'enemy'. Please consider moving the Lava Ridge Wind Energy Project to another location away from Minidoka to protect the National Park Service's intent of the Minidoka National Historic Site. The wind farm adjacent to the historic site would significantly degrade the Minidoka experience for future generations. It would visually impact the experience of quiet isolation and remoteness. It is a place that preserves their memory and continues to acknowledge their sacrifices and the hardships they endured. It provides an annual place of remembrance and healing.
Individual	NPS03 - 3 - Minidoka NHS	Minidoka should be respected like a cemetery. It is a place for remembrance and healing. Survivors can reveal to themselves, and possibly to others as well, the pain and bad memories that have been buried within them. Their following generations too can find healing from often unspoken memories that were passed onto them. Minidoka should not be visually polluted with a multitude of wind towers and fans. Noise during construction, repairs, and maintenance should not be allowed to distract from a healing atmosphere. I had hoped that in time the existing road leading into the Minidoka site would be rerouted to the other side of the canal as the current occasional traffic noise interferes with a respectful situation. To have more roads and traffic in the area must not be allowed or encouraged.
Individual	NPS03 - 3 - Minidoka NHS	I am writing in opposition to the proposed wind farm on or near the Minidoka Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	I am writing in regards to the proposed Lava Ridge Wind Project which would greatly impact and affect the experience of visiting the historically vital and impactful site of Minidoka.
Individual	NPS03 - 3 - Minidoka NHS	My comments are submitted with the plea that you will move the planned wind turbines to an area far enough away from the MNHS that they will not dominate and interfere with the public being able to experience and learn from the place representing the poignant and tragic history of many Japanese Americans and Japanese nationals.

Commenter	Comment Code	Comment Text
Individual	NPS03 - 3 - Minidoka NHS	The most problematic issue with this proposal is how disrespectful it would be to our community, which endured extreme racism at this very site, being denied our rights, freedom, liberty, health and safety, and even using our young men as cannon fodder in the most dangerous military situations. The wind farm would be very disruptive at the site, in both the scenic value and noise pollution. We hold the moral authority to demand for this wind farm to not be built next to this sacred ground, and request that you fulfill your moral obligation
Japanese American Museum of Oregon	NPS03 - 3 - Minidoka NHS	The visual pollution and intrusion that would occur from the Lava Wind Ridge Project would dishonor and destroy the integrity of the site and the profound experience of the sacred site. Japanese Americans should not compete with clean energy addressing climate change. Minidoka is a site of consciousness. Please protect this place for all the generations that follow us.
Individual	NPS03 - 3 - Minidoka NHS	I am a 80 year old. physician who was interned at the ageof18 months in Minidoka. I I may be one of the last survivors. When we are all gone, I trust that the heritage of Minidoka will not be forgotten.
Individual	NPS03 - 3 - Minidoka NHS	This is a note in opposition to the proposed energy generators adjacent to Minidoka National Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	I object to the construction of a wind generation project within the lines of sight around the perimeter of the Minidoka Internment National Historic Site. Surely, there are alternative sites proposed that can provide a similar out put of energy without endangering the native birds, butterflies, and bees that reflect the balance of nature at a time my families were victimized by an imbalance of cultural confusion and fear. Please, help us preserve the historic site without jeopardizing its unique historical environment. 200' wind generator blades would give the impression that the historic memories and events are irrelevant. They are very relevant at a time when our constitution is being challenged. Retain the peace and solitude of the Minidoka environment for future generations.
Individual	NPS03 - 3 - Minidoka NHS	I believe the Lava Wind Ridge Project changes this sacred location in an irreversible way. Clean energy is certainly an important goal, and so is environmental and historical preservation. When selecting a building site, it seems appropriate to give the legacy of thousands of Japanese Americans at least the same consideration given to the sage grouse, which I understand caused other sites to be passed over.
Individual	NPS03 - 3 - Minidoka NHS	By surrounding Minidoka with hundreds of giant wind turbines, the project is threatening the power of remembrance at this site. It will interfere with the evocation of the experience of Japanese Americans during World War II. It will destroy Minidokas ability to commemorate those who suffered and serve as a place of healing and learning. It will desecrate sacred ground.
Individual	NPS03 - 3 - Minidoka NHS	There is also the aspect of the Minidoka relocation camp being in such close proximity. I believe this project will greatly reduce the historical value of the camp and the time and effort that has been invested in restoring the camp, especially with more power lines, substations, and roads.
Individual	NPS03 - 3 - Minidoka NHS	Given this history and Minidokas significance to survivors, the Japanese American community at large, and our heritage in the US, I would encourage you to reconsider the construction of 400 wind towers. From what I have read, these towers will be in plain sight of visitors to Minidoka National Historic Site. In my professional opinion, these towers will diminish the cultural landscape and overall visitor experience at Minidoka. Minidokas currently vast, barren landscape is a statement about incarceration itself; Japanese Americans were forcibly removed from their homes and imprisoned in some of the most remote, environmentally hostile locations in the Western United States. The construction of 740 feet tall wind towers will be a distraction to visitors at best, and, at worst, seen as yet another layer of racialization that Japanese Americans have endured and continue to face in the United States.
Individual	NPS03 - 3 - Minidoka NHS	The building of a wind farm in such close proximity would dishonor the sacrifices made by my mother and all those who were incarcerated at Minidoka. I urge the Bureau of Land Management to consider an alternative site for this project. The protection of all historical sites is of significant importance to future generations. One question: Would this project even be considered if the property in question were Gettysburg or Mount Vernon? I think not.
Individual	NPS03 - 3 - Minidoka NHS	5. What will be the optics of giant windmills surrounding or present near the Minidoka National Historic Site? The image this brings to me is frightening; the giant, white towers watching over the Minidoka memorial site offends me.
Individual	NPS03 - 3 - Minidoka NHS	6. The efforts of Lava Ridge to harness wind energy should be taken ELSEWHERE, away from the Minidoka National Historic Site.
Individual	NPS03 - 3 - Minidoka NHS	I am writing to encourage you to preserve the integrity of the Minidoka National Historic Site. It is important and imperative that this sacred space, a space of remembrance and conscience is forever honored. This space reminds us that never again must we incarcerate whole communities out of fear nor erase the past and the people negatively impacted by our country's political decisions. As proposed, the Minidoka National Historic Sites historic, natural, and cultural resources are profoundly threatened. Please think creatively and find a solution that protects the integrity of this important national testament.
Individual	NPS03 - 3 - Minidoka NHS	As the daughter of a former internee at Minidoka, I must protest the location of the proposed wind farm. As I understand it, the project would infringe on the visual appreciation of this site, effectively diminishing the impact this desolate and isolated site needs to convey what happened here. Please reconsider the siting of this project so the message of this historic site remains intact.
Individual	NPS03 - 3 - Minidoka NHS	I'm writing to express my grave concerns about the plan of LS Power to construct a large wind farm in close proximity to the Minidoka National Historical Site in Idaho. I've known for many years about the incarceration of Japanese Americans during WWII but I've only learned more recently about the extent of the damage that experience caused to so many good Americans. I have two friends who were interred in two of the camps, one at Minidoka, and I've learned from them more than I ever realized about the devastation that experience caused to families who never deserved such outrageous treatment, and even to those who came after. I've also come to understand the role the Minidoka Site plays in the healing process for those families. I understand the importance of renewable energy to the future of our country and our entire planet. I support the development of wind farms in good locations. And I know that finding and developing such locations is a difficult process. But building a wind farm so close to a site of such historic and moral importance would be an offense to American decency and both injury and insult to so many Americans who have endured enough. Please find a more suitable site for this farm.
Individual	NPS03 - 3 - Minidoka NHS	For those who lived behind the barbed wire, I can imagine a pilgrimage offering a deep sense of healing as the floodgates of emotion open up. Although I am a generation removed, the toll of the Incarceration years and its impact on our family is a part of my identity and how I view the world. It will continue to inform how I raise my children and it will play a role in shaping who they are as well. Minidoka holds lessons not just for those directly touched by it, but for all humankind. It speaks, and we all must listen. If the Lava Ridge Project moves forward, that voice will be muffled by the sound of turbine blades and the ominous presence of mechanical wind giants dotting the horizon. Minidoka is being threatened. This site exists well beyond the physical boundary that one can draw in the dirt. The open expanse, the silence, and every Japanese American who walked the ground waiting for another day to pass make Minidoka a place worth preserving.
Individual	NPS03 - 3 - Minidoka NHS	I disagree strongly with the proposed siting of the Lava Ridge Wind Project. Its proximity to the Minidoka Historic Site is in blatant disregard for the feelings of the survivors and descendants of those incarcerated at the Minidoka Concentration Camp. The 400 wind towers should be relocated to another site so that they will not impinge on the visual and aural integrity of this NATIONAL PUBLIC MONUMENT. This site was designated and protected for all people for all time. One can only hope that BLM could show more respect and compassion for others. Memory of this tragic event in our history should not be forgotten or run over by a BLM contractor based on their profit margin. The monument should be a place of reverence and contemplation, not battered by a giant noisy and distracting wind farm. It is highly unlikely that our current President would agree with the current BLM plan.
Individual	NPS03 - 3 - Minidoka NHS	I would like to make a public statement in favor of preserving the Minidoka confinement site in which Japanese-Americans were incarcerated during World War II. My personal family was not held at this confinement side, my family was held at similar sites. This site should be held as a national Monument and preserve by the national Park service. By law, the National Park Service is required to manage the park's fundamental resources and values unimpaired for future generations. As stated in the Park's Foundation Document, these values include: Environmental Setting: Commemoration and Healing Public Understanding, Education, and Involvement And should be preserved and made into an educational landmark future generations to view and understand this part of American history. Please consider making it a historical landmark and preserving it for future generations.
Individual	NPS03 - 3 - Minidoka NHS	When I give tours to schools at the site, it's hard for students to imagine the isolation incarceratedees faced because so many of the farms remain. Since many of these are remnants of the camp, we can show them as part of the sites legacy. Windmills are not part of that legacy. We must keep Minidokas viewsheds open and maintain the sanctity of the site for future generations. Wartime incarceration of Japanese Americans is widely acknowledged as one of the greatest injustices in our nation's history. The Civil Liberties Act of 1988 formally apologized to each incarceratedee. We cannot continue the injustice by degrading this sacred ground. Japanese Americans were already condemned and punished without due process. The proposed Lava Ridge project cannot be allowed to move forward without doing its own due process of exploring alternative sites. This was never just a Japanese American story, but an American story with repercussions we are still dealing with today. I am an ardent supporter of renewable energy, but not on a site used by so many for reflection and healing. I urge you to defend the sanctity of this site by keeping the viewsheds clear of obtrusive, imposing, and noisy wind turbines.

Commenter	Comment Code	Comment Text
Individual	NPS03 - 3 - Minidoka NHS	<p>I am 98 now. It has been a great many years since I was incarcerated at Minidoka as a teenager. It was a difficult and painful chapter for my family, and a dark and shocking chapter for American civil liberties as well. Now, more than ever, we need to learn from these lessons of our past.</p> <p>A valuable segment of American history will be lost if the Minidoka National Historic Site were to be overshadowed by the Lava Ridge wind turbine project.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>Please reconsider Lava Ridge Wind Project as it will forever change the landscape and the atmosphere of this important historic site of conscience:</p> <p>Minidoka provides a place for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history.</p> <p>Minidoka is Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today.</p> <p>I strongly encourage you to reconsider and protect this valuable historical site.</p>
National Trust for Historic Preservation	NPS03 - 3 - Minidoka NHS	<p>The National Trust is concerned that the proposed project will substantially impact the Minidoka National Historic Site. Minidoka National Historic Site is a former Japanese internment camp that between 1942-1945 housed over 9,000 Japanese-Americans. It was designated a National Monument in 2001, and then was re-designated as a National Historic Site in 2008. The National Trust has previously engaged in efforts to ensure the preservation of Minidoka, including identifying it in 2007 as one of our 11 Most Endangered historic sites and engaging in litigation from 2008-2012 to help protect it from a livestock confinement operation that was proposed nearby.</p>
National Trust for Historic Preservation	NPS03 - 3 - Minidoka NHS	<p>The National Trust is also concerned about the potential for direct physical impacts to structures at the Minidoka National Historic Site, including vibratory effects from construction activities. The Draft EIS must address these concerns.</p>
National Trust for Historic Preservation	NPS03 - 3 - Minidoka NHS	<p>Overall, the preservation of the solemn nature of the Minidoka National Historic Site is of paramount concern to the National Trust. The Lava Ridge Wind Project must respect not only the physical presence of the National Park Service at Minidoka but also the nature of Minidoka as a historic site. Substantial visual impacts to Minidoka would significantly compromise its historic integrity, as the experience of an isolated, rural landscape setting is integral to communicating and experiencing its character and significance. It is our sincere hope that the Draft EIS will identify alternatives that avoid and minimize these harmful impacts.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>Minidoka's importance is very personal. Due to the trauma my father suffered as an incarcerated, he never spoke about his youth and wartime experiences. It was only when my son and I convinced him to attend a Minidoka pilgrimage did he finally open up (just a little) and share stories from his childhood and his time at Minidoka. If not for attending the pilgrimage, it is doubtful that my father would have felt comfortable sharing his stories of loss, fear, and hopelessness. As someone who normally shies away from public speaking, my father felt compelled to share his stories with other incarcerateds and their families. Allowing my father to re-experience Minidoka were the first steps toward healing from the trauma he experienced during his incarceration.</p> <p>Now to learn that a power company wants to build 400+ gigantic windmills in and around Minidoka is very painful to my father, his fellow incarcerateds, and the descendants of the incarcerateds. Minidoka is a "sacred place" where we go to remember, reflect, process and heal. Allowing a power company to fundamentally change the viewshed and construct power lines and gigantic windmills is disrespectful to my father, his fellow incarcerateds, and the descendants.</p> <p>We ask you to reconsider and block construction on this hallowed ground. Please do not move forward with this project. It will reopen old wounds and diminish the importance of Minidoka. We need to protect sites like Minidoka so that they serve as a reminder of the need to follow civil and human rights and protect the rights of all people regardless of background, ethnicity, etc. What happened to the 120,000+ people of Japanese descent can never be repeated upon any other group.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>As someone who has been personally affected my Japanese American internment (my grandfather was incarcerated at Minidoka), I feel as preserving the history and legacy of these wrongful actions is very important.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I have a great concern about the building of wind farms around Minidoka; a historic memorial to the American Internment camp for Japanese Americans. I was able to visit Minidoka in 2019 and saw what my great grandparents, Kiyoko and Katsumi Nakayama and great aunt, Joni Kimoto, who were brought on trains with blacked out windows so they couldn't see where they were going, first saw this unknown place. They were met with barbed wire, and the vast Idaho desert, flat and barren with dust storms and frigid nights. This landscape is an integral part of how this history is told, for the visitors to be able to step into the conditions that were forcibly put upon Japanese Americans. My Grandfather, Keith Nakayama, was born with barbed wire and towers with guns surrounding him. Being in that vast desert was integral to my experience at Minidoka, exposing me to the intimate feeling of isolation that my family and many others had experienced while imprisoned there.</p> <p>I believe that renewal energy is an valuable cause but not when it threatens to alter an important and painful history, on historic land. To destroy the original conditions is a disrespect to the direly important and integral history of this country.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>The Minidoka National Historic Site is an extremely important location to me and my family. As a child, I along with my entire family were forcibly removed from our home in the Seattle area and were dropped off in a remote and undeveloped location in Idaho. While I was a young child when I was forcibly moved to Minidoka, I still remember the smell, sounds, and environment of Minidoka. Many call this the power of place and it stirs in me memories of being scared, worried, and wondering why my family had to move to this rural and isolated location.</p> <p>I thought that I would never ever return to a place that reminded me of so much heartache and pain. But my son and grandson convinced me to return to participate in the annual pilgrimage sacred land to me and my family. That pilgrimage provided me and my family an opportunity to begin the healing process and begin the journey of understanding how my government treated us Americans as enemy aliens and fundamentally changed the course of so many lives.</p> <p>Minidoka provided my family with a place to reflect, heal, and process the many intertwined and difficult feelings and emotions. While I once considered Minidoka a cursed place, I now realize it should be protected as hallowed ground to remind the government and others that what was done to the 120,000+ people of Japanese descent can never be repeated.</p> <p>That is why it was so disappointing to hear that an energy company was investigating the idea of installing 400 windmills in and around Minidoka, forever changing the nature of the sacred site, ruining Minidokas viewshed, and once again disrespecting those who were illegally incarcerated there.</p> <p>Allowing this gigantic windfarm to operate would open old wounds and desecrate what we consider sacred ground. I implore you to not allow this project to move forward.</p>
Portland Japanese American Citizens League	NPS03 - 3 - Minidoka NHS	<p>The NPS has stated that the towers "will fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS."</p> <p>Outside of my role with JACL, I work in the energy industry and understand the need for clean renewable power. However, I also know there are significant impacts to the land, wildlife, and scenery for projects of this scope and size. Having visited Minidoka, I can attest that putting a large wind project there would ruin many of the qualities that make it so impactful as a historical and educational site. The isolation and remote setting are fundamental for preserving the experience of Americans during World War II.</p>
Portland Japanese American Citizens League	NPS03 - 3 - Minidoka NHS	<p>Every summer, groups of our members, and families with ties to Minidoka make a pilgrimage to the National Historic Site. It is an important opportunity for us to remember, reflect, and reconnect as a community. In addition to these pilgrimages, Minidoka provides educational opportunities for the public to learn about an important part of Asian American Pacific Islander (AAPI) history. It is part of a network of Japanese American camps and other sites of conscience, managed by the National Park Service (NPS) for the benefit of current and future generations.</p> <p>By law, the National Park Service is required to manage the parks fundamental resources and values unimpaired for future generations. As stated in the Parks Foundation Document, these values include:</p> <p>Environmental Setting: Minidokas remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.</p> <p>Commemoration and Healing: Minidoka provides a place for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history.</p> <p>Public Understanding, Education, and Involvement: Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today.</p>
Minidoka Pilgrimage Planning Committee	NPS03 - 3 - Minidoka NHS	<p>The Minidoka Pilgrimage Planning Committee, on behalf of the thousands of pilgrims who have joined us on our sacred journey, is unequivocally opposed to the proposed Lava Ridge Wind Energy Project, which threatens irreparable harm to the historic, cultural, and aesthetic values of the Minidoka National Historic Site.</p>
Minidoka Pilgrimage Planning Committee	NPS03 - 3 - Minidoka NHS	<p>The Lava Ridge Wind Energy Project will permanently transform the landscape of the Minidoka National Historic Site, forever altering the way in which our pilgrims, and the general public, will engage with the story of Minidoka. This engagement is crucial to the experience of visiting the site and is an important part of our mission to educate others on the importance of defending the civil and constitutional rights of everyone in the United States, especially in the face of racial injustice. To ignore the impact that this project would have on a site that bears so much significance to the Japanese American community would only serve to demonstrate how severely the lessons of Minidoka are needed today. The Minidoka Pilgrimage Planning Committee would like to state, clearly and deliberately, our unwavering opposition to the Lava Ridge Wind Energy Project. We hereby request that our comments on this matter be included in the public record.</p>

Commenter	Comment Code	Comment Text
Individual	NPS03 - 3 - Minidoka NHS	I am writing to say that I oppose the Lava Ridge Wind Project set to be built adjacent to the Minidoka Internment Camp on Shoshone-Bannock land. While I support the construction of green energy infrastructure, I do not support the perpetuation of cultural injustice.
Individual	NPS03 - 3 - Minidoka NHS	<p>I am a fourth generation Japanese American. I stand firmly against the current planned placement for the Lava Ridge Wind Farm. The planned placement infringes on the solemnity of the Minidoka National Historical Site and plays a part in the erasure of this important American History.</p> <p>Both my maternal grandparents were incarcerated during World War II as small children. My grandmother was incarcerated with her mother and siblings at Minidoka and my grandfather was incarcerated at Tule Lake with his parents. I have had the privilege of attending the Minidoka pilgrimage hosted at the Minidoka National Historical Site twice. Both times I was deeply affected by visiting the actual site where my grandmother and her family were forcibly incarcerated. The isolation and remoteness of the site drove home that deep injustice that occurred there and gave me space to reflect. It was only possible to truly imagine my great-grandmother arriving to the high desert of Idaho from rainy Alaska with a baby and three children and no idea what the future holds was only possible by being at the site.</p> <p>The environmental setting of Minidoka creates a space of solemnity and allows survivors of the concentration camps and descendants of survivors, such as myself, to reflect on the past and find healing. It is essential to maintain this solemnity to commemorate the survivors of the forced removal and unjust incarceration during World War II. A wind farm near the site would desecrate the site and visually and aurally disturb the solemnity of the site.</p> <p>Additionally, it is vitally important that all Americans know the full history of World War II, including the exclusion, forced removal and incarceration. It is a dark chapter in our history, and has had lasting effects beyond the War. Maintaining the site of Minidoka in its current state of solemnity and isolation allows visitors to contextualize the history in the place it occurred.</p> <p>Renewable energy is vital to having a sustainable future, however we must be thoughtful and intersectional in our considerations for how we implement it. The Lava Ridge Wind Farm project must be moved so as to not infringe on the solemnity of the Minidoka National Historical Site and maintain a reflective and educational space.</p>
Individual	NPS03 - 3 - Minidoka NHS	I oppose of the wind project that is going to be built adjacent to the Minidoka internment camp.
Individual	NPS03 - 3 - Minidoka NHS	<p>The Proposed wind farm, as planned, will obscure and detract from the historical landscape that this NPS site is trying to preserve. Building the wind farm at this location sends a message that we are trying to cover up the lesson this site and its contents are trying to teach. Experiencing the sparseness and bleakness of site as it was then with one's own senses now allows the visitor to understand the predicament that was DICTATED upon my family simply because they were different. Our constitution guarantees Liberty and JUSTICE for all (citizens). Building this wind farm hides the lesson the camp and the interpretive center tries to teach is a TRAVESTY to the concept of JUSTICE FOR ALL.</p> <p>There is plenty of neighboring acreage where the wind farm would (and should) be beneficial. Please move this facility to another location and PRESERVE the lesson of this NPS site.</p>
Individual	NPS03 - 3 - Minidoka NHS	Please reevaluate your decision to construct on this sacred and painful landscape. Do not give my community more to mourn. Prove to my community that although our existence did not matter then, we matter now.
Individual	NPS03 - 3 - Minidoka NHS	I understand that the LRP would advance renewable energy, an important initiative for building a more sustainable system. But I ask that it not impede upon the Minidoka camp to do so. The site is an enduring reminder of how unjust actions sprung from political anxieties that scapegoated people of color.
Japanese American Confinement Sites Consortium	NPS03 - 3 - Minidoka NHS	The Japanese American Confinement Sites Consortium (JACSC) respectfully requests that the proximity, significance, and impacts on Minidoka National Historic Site be given full and due consideration in the EIS for the proposed Lava Ridge Wind Project moving forward.
Japanese American Confinement Sites Consortium	NPS03 - 3 - Minidoka NHS	JACSC is strongly concerned with the impacts the Lava Ridge project as currently planned will have on the integrity of Minidokas setting, feeling, and association, based on the transformation of the surrounding area into an industrial energy complex and the direct impediment of the project on the historic footprint of the incarceration camp.
Japanese American Confinement Sites Consortium	NPS03 - 3 - Minidoka NHS	As proposed, the Lava Ridge Project encroaches on the historic footprint of Minidoka and will forever alter the immersive, commemorative and healing experience of the site, thus dishonoring the legacy of Japanese Americans who were wrongly incarcerated during WWII. It would fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS, as the lands north would be transformed into a large-scale renewable energy site marked by hundreds of wind turbines, transmission towers and associated ancillary infrastructure. Approaching the site and walking its grounds, visitors would no longer experience the feeling of a rural, undeveloped landscape recalling what Minidoka was like during World War II. The site would no longer be a place of quiet, contemplative healing that strongly reflects the feeling and association of the wartime period of Japanese American confinement, a fundamental point of the sites value for present and future generations.
Japanese American Confinement Sites Consortium	NPS03 - 3 - Minidoka NHS	We strongly encourage the DOI and the BLM to fully consider the Lava Ridge Wind Projects overwhelmingly negative impact on Minidoka National Historic Site and its associated community of Japanese American incarceration survivors and descendants, as well as the broader American public's ability to remember and learn from the incarceration. By transforming a sacred site of unfettered, isolated healing and commemoration into a vast industrial energy complex, this project is in direct opposition to the mandate of the DOI and NPS to preserve the site and associated resources unimpaired for future generations, and in opposition to the Departments priorities to advance racial justice.
Coalition to Protect America's National Parks	NPS03 - 3 - Minidoka NHS	<p>Comment # 7: The DEIS should include a section that specifically analyzes impacts to resources and values at Minidoka NHS; and NPS should prepare this section of the DEIS, as provided in 40 CFR 1501.8 of the CEQ NEPA implementing regulations.</p> <p>40 CFR 1501.8 provides that the lead agency may request a cooperating agency with special expertise to prepare portion(s) of the NEPA review document(s). In this case, NPS has special expertise regarding the management and conservation of resources and values at Minidoka NHS.</p> <p>The analysis to be prepared by NPS should include a detailed analysis of visual resource (or viewshed) impacts, including to scale photo simulations, as seen from 3-4 key viewpoints within the NHS boundary. We defer to NPS to identify key viewpoints that are representative of the historical landscape setting of the internment camp and important resource values to be conserved, as described in the NPS Foundation Document. These values include views of open fields and distant mountains that create a sense of isolation on the vast landscape where Minidoka once stood. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives of the Nikkei who were unjustly incarcerated at Minidoka.</p> <p>As part of preparing this impact analysis for the DEIS, NPS should also prepare an impairment analysis as described in NPS Management Policies 1.4.7 to determine and document whether the Proposed Action would cause unacceptable impacts to park resources and values, which is certain, or impairment, which seems likely. Such analysis should be incorporated into the DEIS as an appendix.</p>
Individual	NPS03 - 3 - Minidoka NHS	<p>I strongly oppose the planned siting of the Lava Ridge Wind Project, because its immediate proximity to the Minidoka Historic Site (MHS) would violate both the visual and aural integrity of this public monument. I favor relocating some of the proposed 400 wind towers, so that none would infringe on Minidoka's historic footprint or the park's viewshed (115/360 degrees would be impaired by current plan). Noise level reduction is harder for me, a non-engineer, to recommend. The greater distance the better for locating the wind towers far away from Minidoka's remarkable Visitor Center.</p> <p>I fully support the Council on Environmental Quality's October 2021 timely statement: "When we protect a place as a National Monument, it is protected for all time, for all people." (my emphasis added). BLM should heed this sensible rule and accord Minidoka the privileges its site deserves.</p>
Individual	NPS03 - 3 - Minidoka NHS	If the Lava Ridge Wind Project moves forward, it will change this place, its history, and its ability to serve as a site of remembrance and reflection. The view of the towers, and the noise from the turbines, would cover up the legacy of this event, tarnish the memories of those who went before us, and impair the ability of visitors and descendants to experience Minidoka. They would alter this site in a fundamental way.
Individual	NPS03 - 3 - Minidoka NHS	Through U.S. Congressional and Presidential actions, Camp Minidoka has become the Minidoka National Historic Site. As such, it is hard fought for and sacred grounds. There should be nothing unrelated there nor in the entire view shed surroundings that would dishonor, impair, detract, and/or interfere with the somber ambience, painful memories, history, forbearers respect and appreciation, and visitor experience. This includes pilgrimages there by current and future generations of Japanese Americans.
Individual	NPS03 - 3 - Minidoka NHS	My Mom was incarcerated at Minidoka during world war II. I have been fortunate to have visited the Minidoka site. The barren landscape, quiet, and sense of desolation were quite moving. Imagine placing a wind farm next to the Grand Canyon, behind the White House or in your backyard. I find the proposal quite disturbing. Please consider this proposal carefully. I oppose placing the wind farm so close to a national monument.
Star Lake Grazing Permittees	OOS01 - 1 - General	In addition, the Permittees (and their predecessors-in- interest) have spent over 50-60 years improving the public land resources within the Star Lake Allotment; investing millions of dollars overtime in the implementation of grazing rotations and wildfire protection / suppression, and in the construction & maintenance of seedings, fencing, and water developments. BLM committed to reward us for this investment by activating (at least) our Suspended Use AUMs some time ago, but yet BLM has not processed our 2009 applications to activate our Suspended Use AUMs, though BLM is seemingly now willing to process a Wind project application.
Star Lake Grazing Permittees	OOS01 - 1 - General	<p>In fact, to accommodate the public land resources in the 1960s, the permittees within the Star Lake Allotment took a voluntary reduction in grazing use and committed to an AUM suspension agreement with the understanding that the AUMs would be reactivated once the permittees developed the allotment with rotational management, seedings, water, and fencing.</p> <p>Permittees contend that they have satisfied such commitments over 25 years ago to the level that the Suspended Use AUMs should be or should have already been reinstated. See discussion above as to 2009 applications to activate Suspended Use AUMs.</p> <p>Permittees have made major investments in the resource and also spent nearly \$100,000 in production monitoring to demonstrate the availability of additional forage on a sustained-yield basis. For nearly 12-years BLM has deferred acting on such 2009 applications, and now with this intended wind project, it seems all hope for any return on our investment and fair treatment may be lost. Will the applicant compensate us for such loss investment or will BLM commit to process our 2009 applications?</p>

Commenter	Comment Code	Comment Text
Individual	OOS01 - 1 - General	These are very helpful. Looks like you've pushed the project down towards the Jerome power transmission area and east. Pretty far away from Shoshone and highway 26 towards Richfield.
Individual	OOS01 - 1 - General	It takes skewed environmental studies to support a narrative for windmill construction and operation. Those studies propose breaching dams in Idaho to preserve salmon habitat, reducing clean available energy. The same environmental studies support destruction of Lincoln County economics and equally important environmental agricultural and human habitat by building highly disruptive windmill farms to replace activist and politically directed energy losses.
Individual	OOS01 - 1 - General	The Citizens of the affected Dietrich and Hidden Valley area have and continue to face many challenges and regulations that are one sided in dealing with the Federal Bureaucracy. At the expense of political activism and as a neighboring property manager, decisions made by the Bureau of Land Management subjugate private property to federal regulation as if citizens have no rights or privileges on their own property. The reverse never seems to apply.
Individual	OOS01 - 1 - General	The BLM has estimated the reduction in grazing to be very minimal. This estimate seems very optimistic to SLC. The fact is that in the 1960s SLC took a voluntary reduction in grazing and allowed for an AUM suspension agreement with the understanding that the AUMs would be reactivated once we developed the allotment with seedings, water and fencing. We feel SLC met this commitment over 25 years ago to the level that the AUMs should have been reinstated. We made major investments in the resource and spent nearly one hundred thousand dollars on a production study to prove our case. For twenty years the BLM has failed to act on our request. Now with this wind project, it seems all hope of fair treatment may be lost. We will likely never see our suspended use reactivated as a result of this project.
Individual	OOS01 - 1 - General	Is this project connected to Mr. Simpson's desire/intent to have Idaho's dams removed? He has stated that there will be "new available sources of power." What huge losses that would be for Idaho - to lose clean sources of power generation, loss of water-way shipping capabilities for the state, and water would be gone that irrigates Idaho farms. These are all shameful, frightening and life-changing situations for Idaho's citizens.
National Parks Conservation Association	OOS01 - 1 - General	Landscape-scale planning for energy development offers benefits such as increased permitting efficiency and predictability and decreased impacts to natural, cultural and other resources and values on public lands. BLMs Wind and Solar Leasing Rule, finalized in 2016, established a process for designation of Designated Leasing Areas (DLAs) for wind energy development that are similar to the Solar Energy Zones (SEZs) designated through BLMs Western Solar Plan. In general, we strongly support the designation of wind DLAs in appropriate locations, and we recommend that going forward BLM should focus wind development on public lands across the west in appropriate DLAs.
Idaho Conservation League	OOS01 - 1 - General	<p>Buttes</p> <p>There are several buttes in Jerome County that provide ideal localities for the placement of radio and other kinds of signal towers. The most predominant example would be the butte located east of the Jerome County Airport where several towers are currently in operation. Rarely are the physical attributes of these buttes conducive to other operational activities. Even vegetative crops are intermittent on these buttes, their presence typically determined by the amount of rocky terrain and lack of irrigation water located at each particular butte. For these reasons, signal towers should be allowed on the County's buttes free of any zoning restrictions unless located in or near airport overlay zones. Such towers may be appropriately placed in other locations as well, but their placement in these other areas may require a permitting process so as to ensure the towers do not conflict with other uses in the region. Alternative energy sources, such as wind or solar power, may be appropriate but should also require a permitting process to prevent or mitigate potential conflicts.</p> <p>The term heavy industrial uses are generally defined as uses having inherent characteristics which create air, noise, visual and other forms of pollution. These uses are incompatible with residential, recreational, and tourist uses and, primarily, are to be isolated or, secondarily, well-buffered from other types of land use.</p> <ol style="list-style-type: none"> 1. May emit offensive odor, dust, smoke, glare, gas, toxic materials, light, noise or vibration beyond the site itself 2. May require an uncompensated extension of county services 3. May create off-site impacts which are incompatible with the basic agricultural, recreational and residential uses of the county. Therefore must be located sufficient distance from these zones as to not cause adverse impact. 4. Provide expanded employment opportunities with competitive benefit and wage packages 5. May not detract from the scenic quality of established scenic travel ways in the county. 6. Operate compatibly in close proximity to adjoining commercial or residential purposes.
Shoshone-Bannock Tribes	OOS01 - 1 - General	While sustaining energy production in the Northwest is critical, implementing large scale production measures should also alleviate energy needs in other parts of the region. As such, the Tribes request that if this project is approved the proponent will in tum advocate for the removal of the lower 4 Snake river dams, since they will no longer be needed for power production.
Venice Japanese American Memorial Monument Committee	OOS02 - 2 - Other Projects	In 2015, The Manzanar Committee with community members and organizations in Inyo County protested the Los Angeles Department of Water and Power plan to build a 200-megawatt photovoltaic solar power project covering 1,200 acres of the Owens Valley floor, about three miles east of the Manzanar National Historic Site. The Venice Japanese American Memorial Monument Committee supported this opposition to the solar power project in California, and now supports the opposition to the proposed wind energy project in Idaho. The noise, traffic, and visual blight of both projects' energy apparatus and supporting buildings would mar the bleak and wind-swept landscapes that greeted the American concentration camp internees at Minidoka and at Manzanar, many of whom would live in the camps for the duration of World War II.
Idaho Conservation League	OOS02 - 2 - Other Projects	In ICLs 2011 comments on the China Mountain Wind Project, we had also recommended amending the Jarbidge Resource Management Plan to clearly remove Sage-grouse Priority and Important Habitat Management Areas in the Browns Bench/China Mountain area from consideration for energy development projects. The China Mountain Wind project was originally proposed by Renewable Energy Systems (RES) and fortunately did not move forward, but our recommended protections for sage-grouse were never instituted. While the State of Idaho's Sage-grouse Management Plan and the BLMs Amended Resource Management Plans discouraged wind energy development in and around the Browns Bench area, there was still enough wiggle room to potentially configure a project in the area. As a result, LS Power spent significant resources investigating the potential for developing its own wind project in the vicinity of the Browns Bench area. LS Power also investigated pursuing a wind development west of Oakley known as the Big Cedar Project west of Oakley. Both project areas had high potential for conflicts with sage-grouse. LS Power eventually decided to move forward with the Lava Ridge project instead which is located outside of Sage-grouse Priority and Important Habitat Management Areas, a move we support. We are concerned that, with the completion of the SWIP North transmission line, other developers may again attempt to pursue a project in or around the Browns Bench or Big Cedar Project areas and that the protections provided by the State and BLM ARMPA are still not sufficiently protective. We note that sage-grouse concerns resulted in the Cottterrel area being Congressionally withdrawn from wind development before the Cottterrel Wind Project could be constructed. We believe that a resource management plan amendment or some other action needs to be taken to protect sage-grouse in the Browns Bench, Big Cedar and similar areas.
Idaho Conservation League	OOS02 - 2 - Other Projects	From ICLs perspective, additional renewable energy projects will be needed and are already being proposed. Based on the lessons learned throughout the Lava Ridge permitting process, energy companies, the BLM, National Park Service and other federal, state and local agencies should take a fresh look at appropriate locations for projects so that developers have better certainty about project development.
Coalition to Protect America's National Parks	OOS02 - 2 - Other Projects	<p>994 BLM Record of Decision (ROD) for the Southwest Intertie Project (SWIP)26 The ROD approved the granting of a public land right-of-way to Idaho Power Company, Boise, Idaho for the construction, operation, maintenance, and termination of the Southwest Intertie 500 kilovolt (kV) electrical transmission line project (SWIP). SWIP would be constructed in phases and eventually provide a high voltage transmission connection between Las Vegas, Nevada and the Midpoint Substation near Shoshone, Idaho.</p> <p>With regard to the proposed construction of SWIP within the BLMs Shoshone District (location of the current wind farm proposal), the 1994 ROD stated, [the Monument RMP], while not specifically designating Right-of-Way corridors, provides that public lands may be considered for the installation of public utilities, except where expressly prohibited by law or regulation. The proposal [i.e., SWIP] is determined to be in conformance with the existing management plan and no amendment to that plan is necessary.</p> <p>Similar to the Monument RMP, the 1994 SWIP ROD did not contemplate the creation of Minidoka Internment National Monument by Presidential Proclamation in 2001; or the establishment of Minidoka NHS by act of Congress in 2008. In addition, the ROD contained no VRM inventory or class determinations that would serve as a baseline for evaluating potential visual impacts of the proposed wind farm.</p>
Individual	OPP01 - 1 - General	<p>I am AGAINST this project, it is futile:</p> <p>Windmills require petroleum every single step of their life cycle. If they can't replicate themselves using wind turbine generated electricity, they are not sustainable</p> <p>Not enough rare earth metals and enormous amounts of cement, steel, and other materials required</p> <p>Wind blows seasonally, so for much of there year there wouldn't be enough wind</p> <p>When too much wind is blowing for the grid to handle, it has to be curtailed and/or drives electricity prices to zero, driving natural gas, coal, and nuclear power plants out of business</p> <p>The best wind areas will never be developed</p> <p>The Grid Can't Handle Wind Power without natural gas, which is finite</p> <p>The role of the grid is to keep the supply of power steady and predictable. Wind does the opposite, at some point of penetration it may become impossible to keep the grid from crashing.</p> <p>Windmills wouldn't be built without huge subsidies and tax breaks</p> <p>Tremendous environmental damage from mining material for windmills</p>

Commenter	Comment Code	Comment Text
		<p>The best wind is too high or remote to capture</p> <p>Less wind can be captured than thought (see Max Planck Society)</p> <p>Wind is only strong enough to justify windmills in a few regions</p> <p>The electric grid needs to be much larger than it is now</p> <p>Wind blows the strongest when customer demand is the weakest</p> <p>No utility scale energy storage in sight</p> <p>Wind Power surges harm industrial customers</p> <p>Energy returned on Energy Invested is negative</p> <p>Windmills take up too much space</p> <p>Wind Turbines break down too often</p> <p>Large-scale wind energy slows down winds and reduces turbine efficiencies</p> <p>Offshore Wind Farms likely to be destroyed by Hurricanes</p> <p>The costs of lightning damage are too high</p> <p>Wind doesn't reduce CO2</p> <p>Turbines increase the cost of farming</p> <p>Offshore Windmills battered by waves, wind, ice, corrosion, a hazard to ships and ecosystems</p> <p>Wind turbines are far more expensive than they appear to be</p> <p>Wind turbines are already going out of business and fewer built in Europe</p> <p>TRANSPORTATION LIMITATIONS: Windmills are so huge they've reached the limits of land transportation by truck or rail</p> <p>Windmills may only last 12 to 15 years, or at best 20 years</p> <p>Not In My Back Yard NIMBYism</p> <p>Offshore wind turbines could affect fisheries</p> <p>The quality of wind resources is location specific, with the best locations often found far from the load center</p> <p>Dead bugs and salt reduce wind power generation by 20 to 30%</p> <p>Small windmills too expensive, too noisy, unreliable, and height restricted</p> <p>Trucks are the basis of civilization, when diesel runs out, collapse will follow. Trucks can't be electrified</p> <p>Germany has been spending more for much longer than other nations, and Energiewiende is a huge failure</p> <p>Wind turbines more expensive to decommission than construct so often not recycled</p> <p>Transmission lines need to be much longer than for fossil plants, and likely to spark firestorms causing billions in damage</p> <p>Decommissioning wind turbines costs as much as \$500,000 per wind turbine</p> <p>Wind turbines threaten biodiversity in hundreds of protected, key biodiversity, and wilderness areas</p> <p>Wind turbines and solar PV depend on the energy storage of coal and natural gas plants to provide power when the wind dies</p> <p>Operations and Maintenance (O&M) costs are too high</p> <p>Increasingly high insurance costs from hurricanes, wildfires, tornadoes, defective equipment, untrained personnel and more</p> <p>Turbines can't be improved much, they are nearing the maximum possible harvesting of wind</p> <p>Blades need to be de-iced with helicopters in the winter</p> <p>Turbines are so heavy they damage roads during delivery</p>
Individual	OPP01 - 1 - General	Worthless wind turbines, slaughter birds of prey including the Bald Eagle and generate little energy. An absolute waste of time and money. How much of this cost is being subsidized by the government? A loud NO to more wind turbines!!
Individual	OPP01 - 1 - General	We vote against using our Idaho public lands for this huge wind project. The benefits do not outweigh the positives, and it would be a shame to take away Idaho's natural beauty and turn it into a California. Voting NO in order to save Idaho!
Individual	OPP01 - 1 - General	I own a house in filer Idaho and I completely oppose any windmills. Instead we need a shooting range for the people of the Twin Falls area. California has a whole desert to build their own.
Individual	OPP01 - 1 - General	This letter is written to record my recommendation on the proposed wind farm project in southern Idaho. I strongly oppose installation, and operation of any wind farms in southern Idaho. We have sufficient hydro resources (if we will be wise enough to utilize it) and the option of nuclear, which are both more economical, consistent, and environmentally sound. Wind turbines are expensive polluters.
Individual	OPP01 - 1 - General	<p>Windmills are neither efficient nor environmentally friendly. We need not put Idaho in a position to fill the land with buried windmill parts in 10 years when they are know longer usable. Furthermore, the parts are made in China, so there is also no reason to place Idaho's energy dependence in the hands of a foreign government.</p> <p>This should not even be a question when you have windmill dependent California to look at as an example of what not to do.</p>
Individual	OPP01 - 1 - General	The only option is to deny the permit and not allow it to happen. Anything less is immoral.
Individual	OPP01 - 1 - General	When the federal government has to subsidize wind turbines to make them economical, they are not financially profitable. Idaho has economical hydro-electric power that doesn't require all of the waste of wind turbines. Thank you for taking my comments.
Individual	OPP01 - 1 - General	<p>It will also require huge amount of concrete in a time and area were there is a concrete shortage. Also looking at the map some of there proposed windmills are located on private ground. The fact that this mistake was made shows how careless this proposal was put together.</p> <p>I can not name one positive thing about these windmills and the BLM should manage the Public Land with the local people in mind and deni this permit!</p>
Individual	OPP01 - 1 - General	Is this energy source going to be worth it in the long run? Will the cost of the windmills, loss of public land, animal habitat, and the waste from worn out windmills be worth it in the end. Land is not produced and when it is gone it is gone. We all know windmills have a negative impact on birds and wildlife. Is lining the pockets of the parties involved in this transaction worth what is lost? What state is the generated power serving? Is it Idaho or a state like California? If it is other states than they can use their own lands and stop destructively consuming Idaho's.
Individual	OPP01 - 1 - General	The only redeeming quality is they produce power, but at a much less efficient rate that gas or coalyes I said coal that has been proven to produce energy cleanly and efficiently. If it wasn't for government incentives, you wouldn't be able to find and investor putting his money into these projects! I know I am spitting in the proverbial wind because the big money that is behind these projects will not be stopped, but I will be around to let you know of all the damage you will allow to happen in our beautiful state.

Commenter	Comment Code	Comment Text
Individual	OPP01 - 1 - General	As a lifetime Idaho resident I am opposed to LS energies proposed wind generation farm. Keep the public land clean of unsightly windmills that kill many birds. The cost to benefit ratio of this type of power generation is higher than all other forms of production.
Individual	OPP01 - 1 - General	I do not want to see the Lava Ridge wind farm anywhere in Idaho, let alone on public land. The public has little to gain as the majority of the energy will be exported. We don't need to look at the mess or pay to clean it up after it's usefulness is gone.
Dietrich School District #134	OPP01 - 1 - General	Because, at this time, our community, patrons and school district are likely to have the most short and long term impact from the negatives of the Lava Ridge Windmill project, we as a board to trustees are registering out stance against the Lava Ridge Windmill projects approval by the Bureau of Land Management.
Individual	OPP01 - 1 - General	I oppose the lava ridge windmill project other countries have already decided such as Germany that the cost does not justify the means it's harmful to the environment it kills many birds please consider other projects
Individual	OPP01 - 1 - General	Please reconsider this project as it shows little benefit for Idaho and wind farms have been shown to destroy wildlife habitat, not to mention the turbines themselves are not recyclable. These turbines will have a negative impact on the wildlife, habitat, visual appeal, surrounding national historic sites (Minidoka War Relocation Center, Craters of the Moon, Wilson Butte Cave, etc.), noise level, and the darkness of the night sky for star gazers.
Individual	OPP01 - 1 - General	Please shut down this ridiculous plan! It makes no sense to plug up our wilderness with eyesores and run off wildlife just to sell power to another state! They don't generate enough are inefficient and there are much better solutions. If they want it then they can build it in their own back yard. As a Sportsman I personally spend a lot of time around these and witness their negative impact on wildlife
Individual	OPP01 - 1 - General	I am emailing to let you know that as a Magic Valley, Idaho resident I very strongly oppose this project
Individual	OPP01 - 1 - General	Please do not approve this project It is not a win-win for Idaho.
Individual	OPP01 - 1 - General	Please, please don't do this to our public lands, and don't do this to the taxpayers.
Individual	OPP01 - 1 - General	I am vehemently opposed to the windmill project proposed by Lava Ridge Wind Farm.
Individual	OPP01 - 1 - General	I oppose this project on the grounds of viewshed pollution, light pollution, endangerment to birds and other wildlife, environmental degradation from widespread and excessive soil disturbance, restriction of access to public lands, the adverse environmental impact from the manufacturer, transport and ongoing maintenance of 400 wind turbines and noise pollution.
Individual	OPP01 - 1 - General	Windmills are not the best alternative for Idaho. Rather exploring small modular reactors are a better option- less footprint, carbon free, and generate much more power. This project should not proceed in any way unless it is clear exactly how the windmill is recycled with a guaranteed contract so they do not fill precious landfill space when no longer operating, need to know that all power is staying in Idaho first and not leaving the state, and ensure the company compensates Idaho from some of its profits (consider what Wyoming does, requires energy companies to put profits into schools).
Individual	OPP01 - 1 - General	I oppose the Lava Ridge wind project. I believe this wind farm will damage the natural ecosystem and create mechanized blight on our public grounds. The BLM was designed to protect and preserve our public grounds and I believe this project will be detrimental to our cherished open spaces. I urge you to consider the environmental studies that have been completed by independent third party professionals. Any economic benefit of this project would generate is not near enough to offset the ecological damage it would create, such as damage to habit of wildlife including protected species. In addition, the long term economic benefit will not be for the citizens of Idaho. I appreciate the opportunity to comment.
Individual	OPP01 - 1 - General	I read the Times New of September 19, 2021, where people were upset about the 73,000 acres of Idaho's land for the 400 windmill turbines. Then on September 20, 2021, the article was how the project was too near the Minidoka National Historic Site. Then I read the article in the Bull Herald issue of September 21, 2021, about the project. 1. Wanting to place 400 windmill turbines across 73,000 acres of Idaho's public BLM land. 2. The power generated going through Idaho to Nevada, the desert Southwest, and then to California. 3. The affect on wild life, on the land itself, and the symptoms many of our people would develop living near the project when the majority of power would be sent to neighboring states. I am a native Idahoan. I was born in Mackay, Idaho, and have lived most of my life in Idaho. I have been living in Castleford, Idaho since 1955 and have raised my family here. As a native Idahoan I strongly object to using our public BLM land for the project, the affect on our wildlife and people just have most (if not all) of the power going elsewhere. Please fight against the project.
Individual	OPP01 - 1 - General	As a tax payer since 1964 and property owner, I'm commenting on the Lava Winds Turbine Project proposed going on our Public Lands Minidoka County BLM. Environmentally Unfriendly! Kills Birds! It's Winter Range for Big Game! Totally Ugly to Look at! Economically a Waste of Money! It's a Chinese product with New York money! Remember it's Public Land! For all to Enjoy! Hunting, Jeeping, & ATViing! It's a Very Peaceful & Beautiful Place! Thanks for letting the public respond! Members of Southern Idaho Off Road Ass. & Magic Valley ATV Club! Think Nucular?
Individual	OPP01 - 1 - General	I am OPPOSED to the Lava Ridge Wind Farm project. Do not subject our public BLM lands to this terrible proposal! Wind turbines are negative in every way: they decimate bird, bat, and insect populations; they cause Wind Turbine Syndrome in humans; they destroy valuable wildlife habitat; they are not a reliable source of energy; they are noisy; they are ugly eyesores and negatively impact the visual appeal of a landscape; they are not carbon neutral or "green", since a large amount of petroleum products are used to make and ship them; and these turbines will disrupt the sacred nature of the historical Minidoka Internment Camp site. Do not allow our public lands to be raped and pillaged for a mere 20 full-time jobs and a few million bucks! This sets a dangerous precedence of how our public lands will be used in the future. There is NO benefit to Idaho from this wind farm. The only entities that will benefit from the wind farm are: an out of state company that will profit from it, out of state construction workers that will build it, states like California that will buy the energy produced by it, and countries like China that make the turbine parts for it. Do not sell out Idaho and do not succumb to this con job! NO, NO, NO!!!
Individual	OPP01 - 1 - General	Attending meetings, making the effort to be properly informed and desiring the best for my family, community and friends, I encourage accepting the projects negative impact on the Dietrich Community, school and citizens to be sufficient for the Lava Ridge windmill projects rejection.
Individual	OPP01 - 1 - General	1. I am not in favor of the Project at its proposed location.
Individual	OPP01 - 1 - General	Keep it away from Highway 26 and the town of Dietrich.
Individual	OPP01 - 1 - General	I have been interested in alternative energy sources but I don't think wind power is the answer.

Commenter	Comment Code	Comment Text
Individual	OPP01 - 1 - General	As third generation Japanese-American children and grandchildren of internees at the Minidoka concentration camp, we are extremely opposed to the current proposed location of the Lava Ridge Wind Project.
Individual	OPP01 - 1 - General	Thank you for reading, I am very much against this project for a number of reasons. Appearance, the fact that it is not carbon neutral and the effects on wildlife. These things are not easily reversed.
Individual	OPP01 - 1 - General	I, Glenn and Sandy Fischer, would like to on record as strongly opposing The Lava Ridge Wind Farm.
Individual	OPP01 - 1 - General	I am against it.
Individual	OPP01 - 1 - General	Please reconsider the area you have selected to implement your 400 mill wind farm or possibly rethink your energy source. There are few states in the US that are blessed with public lands for recreational use. We need to preserve our natural habit for our precious ecosystem and by putting in this system we will be destroying the land to produce energy on a system that only has a 15-25 lifespan and costs more energy to build than it will ever produce. If you do the math carbon for carbon and factor out the cost you will understand it is not worth it.
Individual	OPP01 - 1 - General	I was recently made aware of the LAVA Ridge Project. I am in strong opposition of this windfarm in Idaho. I am aware of what these projects do to the wildlife and environment. Please do not go forward with allowing this project.
Individual	OPP01 - 1 - General	I am 100% opposed to this windmill turbine project. Giving up 7,300 acres of Idaho property to a New York based company is not right. Once it is gone it is gone forever, lost, destroyed and with it goes wild life, land scape, animals, people, this property is part of us. It is ours not to give away to some out of state company that has no regard or respect for us. If this is such a great project then put it in California or Nevada. I consider this project request an insult. "Let's put this ugly land scape mess in Idaho. I am sure they are stupid enough to let us do it, we don't want it in our state". I am sure this has been stated. Besides an eye sore mechanical menace, what else are we going to receive from it? Nothing!! Not a single thing. We lose 73,000 acres and turn over that much land to be controlled by a New York company along with all the right of way for our power lines, sub stations and whatever else they deem necessary. No please do not approve this project. I moved to Idaho 25 years ago to escape this kind of stuff and give thanks every day that I live here. As far as I am concerned Idaho is a great place to live and I want it to stay that way. I reside in the county area of Buhl, our neighbor grows corn around our property. They just completed the green chop and asked if we were happy the corn is gone. My reply; I would rather watch corn grow than look out at a dozen houses full of city people. I could not imagine looking at 400 giant wind turbines. I can already see the ones west of me. Please, please do not approve this this is not good for Idaho.
Individual	OPP01 - 1 - General	It is my duty to express the fact that I am vehemently opposed to the proposed wind farm to be located north of Twin Falls called the Lava Ridge Wind Project. I am not a stupid hick and I take your proposal as an insult to my intelligence. Idaho will receive no lasting rewards from this exploitation of our resources and our land.
Individual	OPP01 - 1 - General	My wife and I are strongly opposed to the Lava Ridge Wind project.
Individual	OPP01 - 1 - General	This is to let you know that I am totally against installing wind generator turbines in Magic Valley. They are ugly, expensive beasts that ruin more than the view.
Individual	OPP01 - 1 - General	Because the LRWP is so detrimental to the MNHS, a culminating symbol of the decades of racism suffered by Japanese Americans, and because the environmental damage is so great for everyone in the vicinity of MNHS, and because the uncertainties of detrimental effects of low frequency sound are so inadequately understood, the LRWP should not be allowed to proceed.
Individual	OPP01 - 1 - General	I am opposed to the Lava Ridge Wind Project proposed for Minidoka, Jerome and Lincoln Counties in Idaho.
Individual	OPP01 - 1 - General	The resources it would take from Idaho lands would in no way benefit Idaho, nor its residents and businesses. The impact on wildlife, water resources and native geographic landscape, plants would all suffer. I am against the proposal.
Individual	OPP01 - 1 - General	I feel this would be detrimental to this community. The life span of these wind turbines is about 20 years which is how long it will take to pay them off. So once they start making money they will have to be replaced. Thank you for your time.
Individual	OPP01 - 1 - General	I can see very little benefit locally, it may bring 80 million to the state but they don't have to deal with it locally. I believe that it would be an eye sore to us locals while it ships the power to who knows where and as such I say most definitely no.
Individual	OPP01 - 1 - General	I am opposed to any loss of public land in Idaho for the electrical wind generation project. These types of projects need to be on privately owned parcels. Approval of this project will only create the loss of wildlife, cattle grazing and the enjoyment by American citizens of our public lands on the tens of thousands of acres this boondoggle will occupy.
Individual	OPP01 - 1 - General	I am writing to express my concern over plans for the wind turbine project near the Minidoka NHS. I am concerned that the project will cause significant interference for the local wildlife, native cultures and the Minidoka NHS. I believe the turbines will be an eyesore, noise nuisance and diminish the power and significance of the Minidoka NHS. To place wind turbines in this area would be a mistake. I urge you to consider another area.
Individual	OPP01 - 1 - General	Please do not put all those wind mills in our state. I'm concerned for the health of our children and the effect they will have on the wild life. I live southwest of Buhl and the wind mills are annoying on a night when the wind isnt blowing. They create an eerie and frightening sound. Please investigate the effects of these windmills on the health of our children and wild life.
Individual	OPP01 - 1 - General	I am voicing my opinion on this project. The use of water wells will hurt the water flow to the Hagerman Valley and hinder the other water wells that are already done for irrigation. The disruption of the lava rock ledges will also damage the area. The wind towers are not self sufficient and cause environmental damage. As an Idahoan I do not like putting this in to send power to California. If California needs these for power then install them in California. NOT IDAHO DO NOT CONTINUE WITH THIS WIND PROJECT.
Individual	OPP01 - 1 - General	We have enough wind turbines in the state of Idaho.
Individual	OPP01 - 1 - General	Those wind mills are a waste of money and I don't want any more of those in my state ruining the wildlife habitat and taking away for our public lands!!!!!!
Individual	OPP01 - 1 - General	I personally don't see any benefits for Idaho that this project will bring. I can see a lot of money going out of the pockets of the people of Idaho to support this project in the future .us Idahoans like our open lands (what we have left) let's keep it that way
Individual	OPP01 - 1 - General	I am writing in regards to the Lava Ridge Wind Project that is proposed to bring in the largest wind destruction farm in the US to our area. Not only are those wind towers a sore sight that will ruin our beautiful landscape but they are not green, they are not renewable and they do nothing belong here! These big wind turbines take a huge amount of fossil fuel to make, transport to America and then transport again across America. They kill an immeasurable amount of birds and bats. This area for the proposed wind farm is not only sacred to Japanese Americans but also to Native Americans. These ugly wind turbines are so terrible for the environment that countries like Europe and Japan are outlawing them. They have realized the dangers and destruction these turbines cause far outweigh the minuscule benefits that 400 700ft tall wind turbines will absolutely destroy this area. The devastation that will come to the area alone should be enough for the BLM to halt this project but the name of the company is very misleading. Since when was there a Magic Valley Energy Company? There is not a local company in the valley that is a local energy company. Our wildlife, our landscape and our area will be destroyed so that the mega watts this produces can be sent to California or some far off area. When something of this magnitude does nothing to benefit our area, I would plead with you, to protect our public lands and not allow this to come to our valley.
Individual	OPP01 - 1 - General	As an Idahoan citizen and a strong believer in conserving the rare and beautiful wildlife and scenery of this state, I am writing to express my concerns regarding the proposed Lava Ridge wind farm. Given that this project will consume 75,000 acres of our valuable BLM land, thereby becoming the largest wind farm on this continent, the negative impact upon the state as a whole will be severe. The windmills, at 275 feet, will be the tallest in Idaho, altering the scenery as seen from many important tourist locations (such as the Craters of the Moon National Park). In addition, these windmills will stand directly in the path of large wildlife migrations, killing birds and bats and infringing upon the territory of ground-dwelling animals such as sage grouse. Even worse, the wind farm will be very near the Minidoka Japanese Internment site, an important and sacred historical location to the Japanese-American community. Given recent nationwide concerns over racism and hatred toward the Asian community, it is appalling to think that a site of this nature would be overshadowed by such a sprawling and intrusive project. To move ahead with this plan would be to treat Japanese-Americans with the same racist contempt which led to the existence of the Minidoka Internment Camp in the first place.

Commenter	Comment Code	Comment Text
		Rather than the good of Idaho, its minorities, its wildlife, and its natural beauty, the chief concern in the negotiations regarding this project appears to be mere financial gain. While the company spearheading this wind farm purports to be based in the Magic Valley, it is in fact headquartered in New York. The energy produced by the farm will go to the highest bidder, and no benefit to the state is guaranteed. Even if potential benefits could be demonstrated, however, the cost of insulting minorities, trampling upon history, and destroying wildlife is too high to justify the construction of this wind farm.
Individual	OPP01 - 1 - General	I am against the proposed Lava Ridge BLM wind project
Individual	OPP01 - 1 - General	Why drive down the desirability (PROPERTY VALUES) of my area in order to enrich East Coast investors? This plan would make southern Jerome County less livable, destroying the natural scenic beauty of the desert with future non-biodegradable, quickly obsolete junk from China. Renewable energy projects are extremely expensive and take land out of use for recreation and grazing. I would rather move out of Idaho than have windmills in the neighborhood. Dang. What is wrong with the government we're forced to pay for that this would even be considered as an option?
Individual	OPP01 - 1 - General	I am writing to express my concern about the windmills that are being considered for construction on BLM land. I am very much opposed to it!
Individual	OPP01 - 1 - General	I want to express my strong opposition to the Lava Ridge Wind farm being considered in the Jerome and Twin Falls area.
Individual	OPP01 - 1 - General	My name is John Morimi Shigaki and I am writing this letter in strong opposition to the Lava Ridge Wind Project.
Individual	OPP01 - 1 - General	I have listened to the pros and cons of this site proposal and I have come to the conclusion that this project benefits interests outside of Idaho far more than Idaho and its residents themselves. The pristine landscapes of Idaho and it's natural resources are not a backyard for others who have their own natural areas or cannot build such a project because of the laws and regulations they have created for themselves. Therefore I implore you to end this site project before it even begins
Individual	OPP01 - 1 - General	My name is Ryan Kozu and I am writing this letter of comment in strong opposition to the Lava Ridge Wind Project.
Individual	OPP01 - 1 - General	Kris, I hope you are a man of integrity and courage that will represent Idahoans in the Magic Valley, by opposing the "new green deal". Please do not be a part of the back door corruption, that is destroying our nation.
Individual	OPP01 - 1 - General	I DO NOT WANT to see any WINDMILLS on any IDAHO public lands ever !!!
Individual	OPP01 - 1 - General	I am a concerned citizen of Magic Valley who OPPOSES the Magic Valley wind farms. It will NOT benefit Idaho or Magic Valley AT ALL! It does more harm than good. DO NOT GO THROUGH WITH THIS PROJECT!
Individual	OPP01 - 1 - General	Wind energy is detrimental to our environment and they are not wanted in our community! They are wasteful, have too short of a life span and interfere with migratory birds. These do more harm than good!!
Individual	OPP01 - 1 - General	I say absolutely NO to bringing in the wind turbines that will pollute both the ground and the view of our beautiful state!
Individual	OPP01 - 1 - General	Both my wife (Linda) and I are very much opposed to this project, which will affect the beauty, the wildlife, and the environment of Idaho. And all this MESS will be used for the benefit (not for Idaho) but will be funneled to LA California. We both have lived in Idaho most of our lives, and are here because of the freedoms that we enjoy, and seem to be escaping other states, are still here. Wind farms are ugly, but not only would this project take away a large portion of the beauty of Idaho; it would impact BLM land use by ranchers and hunters because the company leasing the land would be in charge. Please DO NOT let this happen. It is nothing that will help or improve our state!
Individual	OPP01 - 1 - General	Please do not approve this project.
Individual	OPP01 - 1 - General	I don't think having 73,000 acres of land set aside for a wind farm is appropriate. Wind turbines are having negative effects on the environment by interfering with bird migration patterns and also on climate change by slowly increasing the temperature. There is also an article in the Harvard Gazette stating that wind turbine power density is 100 times lower than stated by leading "experts." Also, once there is a dense amount of wind turbines in a 5-10 kilometer area, the power density as affected and lessened because of the interactions that the turbines have. So, really, how effective are they. They are damaging to the environment and they don't even give out the desired effect.
Individual	OPP01 - 1 - General	This proposed project will devastate one of our last pristine high desert landscapes in South Central Idaho. The towers will ruin the viewsapes that are highly valued by thousands of residents who see these open panoramas every day. And the obnoxious flashing lights will ruin the quiet and solitude of the nighttime sky in an area with minimal light pollution. Renewable energy is a good goal to strive for, but this span of desert belongs to the public and needs to continue to be managed for livestock grazing, and for the deer, elk, rabbits, marmots, coyotes, raptors all other creatures that have made it their home for thousands of years. This project will turn a relatively untrammled wilderness into an ugly sky scraper factory. We will need more renewable energy in future years, but wisely sited solar farms can produce the same product with a much smaller footprint and will not take away the fabulous vistas we now enjoy. This proposal is a very bad use of our valuable public lands!!
Individual	OPP01 - 1 - General	Not for it... not on public land. Plus It's not even power for idaho...
Individual	OPP01 - 1 - General	I work in the electrical transmission field. This project will in now way directly benefit Idahoans. Power produced from this project will be wheeled to where the demand pays the highest. The generation produced by this project will also not create enough energy to offset a surplus in the event the power could be used to power Idaho homes and businesses.
Individual	OPP01 - 1 - General	We do NOT want this Operation in our state...It contaminates it and the power is sold elsewhere.
Individual	OPP01 - 1 - General	We are opposed to this project for a number of reasons. What does wind turbines do to the local and migrating birds? This land is public not for a company to make a profit. Where does the power come from when turbines aren't generating!! What does this project do to the land in the proposed area along with public use being eliminated. Our deer and antelope will be disturbed and the general public who truly own this land can't do to it what this project will to the land. We as taxpayers are subsidizing a source of power that is unreliable, costs more and does not support the power grid. BLM wouldn't allow an oil line to cross this land but will go along with windmills disrupting this same land. For all these reasons we are against the Lava Ridge Wind project proposed by the Magic Valley Energy.
Individual	OPP01 - 1 - General	We are vehemently against the Lava Ridge Wind Project!
Individual	OPP01 - 1 - General	I am opposed to this project. Idahoans should not be relinquishing prime hunting and recreation ground to private companies for any reason. I also don't believe that the benefits outweigh the damage to the Idaho landscape and biota.
Individual	OPP01 - 1 - General	Until there is away to properly dispose of the hazardous waste, I'm against the project.
Individual	OPP01 - 1 - General	We have enough of these ugly things, ABSOLUTELY NOT! When the president puts one in his "backyard", maybe.
Individual	OPP01 - 1 - General	I VERY STRONGLY OBJECT TO THIS PROJECT. This proposed Lava Ridge Wind Project is an accident waiting to happen. This project, in my opinion, will only have negative & destructive impact on that area and it's difficult to understand the reasoning that this is even a consideration. The historical sites as well as geological, cultural and environmental features of this area are treasure to behold..... not to destroy! Human occupation in the planned project area stretches back over 15,000 years. Rich and valuable geological features were highly utilized by Native Americans over thousands of years and by Euro-American travelers, emigrants and settlers during the past 170 years. I fear that the planned mega-construction will destroy the unique/volcanic/geological landscape, the wildlife and all other aspects associated within. The damage to the migratory wildlife and sensitive/endangered species alone would be devastating and irreversible. This is an area to be protected and valued.....not be another big business scheme motivated by money and power. Please preserve and protect these valuable assets for us and for future generations and do not allow this project to happen.

Commenter	Comment Code	Comment Text
Individual	OPP01 - 1 - General	This desert region has been grazed by cattle for decades, hunters have hunted for decades, countless people have enjoyed the open scenery of the desert on horse, ATVs, mountain bikes and foot. Why would we ever want 400 wind turbines with numerous roads and overhead power lines layered throughout the desert? This will destroy thousands of acres of natural habitat for deer, elk, antelope, eagles, hawks, snakes, coyotes, badgers, sage grouse, pheasants, and numerous other animals. I love and enjoy the incredible area I live. There is no better place to live and raise a family then the Magic Valley. Why let large government funded corporations come and destroy the quality of life we have in Idaho. Please decline this application for the Lava Ridge Project. I could write countless pages of opposition and concern about these wind turbines, but I'm hoping you have done your research and see this is not a favorable project for the citizens of Lincoln County. I ask again to please decline this application.
Individual	OPP01 - 1 - General	A project this size should not be moving forward during a pandemic. I am for alternative energies, but 400 turbines is too much too fast. Where is the water going to come from? This is a Hugh swath of land, why not start with 50 and see how the environment reacts. Idaho is currently being faced with a fight to save the Salmon and possible removal of Dams along the Snake River-Wind Turbines are sprouting all over the state and the long-term impact is unknown. Birds can only fly so high for so long...desert creatures will be effected by the sound, vibration how??? Will it effect the hibernation cycle?? Their ability to forage or hunt? What about the Pheasant?
Individual	OPP01 - 1 - General	Please don't do it.
Individual	OPP01 - 1 - General	Hello there, I am emailing to urge you NOT to move forward with the lava Ridge project
Individual	OPP01 - 1 - General	Idaho Power people have told me that this project is not directly hooked into the Idaho Power transmission lines; thus there is NO GAIN for Idaho to support or have this abomination project in our backyard. The sometimes-generated power source is being generated for Southern California! Let Southern California erect their own Wind Farm; SAVE the hundreds of miles of new transmission lines being built across Idaho, Utah and Nevada! This whole project reeks of global warming agenda 2030 ideology. Save the planet and build it in California that DOES NOT WANT the Wind Farm but wants the energy.
Individual	OPP01 - 1 - General	I am against the Lava Ridge Wind Project. Wind turbines have a huge footprint in our landscape, are expensive to build and maintain, are inefficient and become a land fill nightmare at the end of their short lives.
Individual	OPP01 - 1 - General	The more I know about wind energy farms, the less that I like them. It is a bad idea because of cost to both the environment and consumer. The reasons are many. Please do not approve this wind farm.
Individual	OPP01 - 1 - General	I completely oppose the project. First off it is a eye sore for the area. It will ruin any recreation in the area.
Individual	OPP01 - 1 - General	Please do not pursue this project that takes away our land from farmers and wild life. The project will not benefit Idaho and use our natural resources, water, grazing areas to complete the eyesore that we will have to live with for years to come.
Individual	OPP01 - 1 - General	It is very difficult for me to believe that the BLM would approve such a lease as this as it is detrimental to wildlife, detrimental to the ranchers who would lose their grazing rights, detrimental to sportsmen and the biggest question of all is where are they going to get the amount of water they need? From our farmers? From the aquifer? And how about the big question of the fact that those blades are not biodegradable or recyclable??? I personally oppose this project with every fiber of my being and sincerely hope and pray that you will apply common sense and the well being of Idaho's economy to your decision. Thank you for listening.
Individual	OPP01 - 1 - General	Idaho does NOT need more windmills ! That is Public Land and should not be used for anything that will change the landscape for profit !! There are already to many windmills in Idaho now & we don't want more of them ! The wind blows in California too so let them put windmills there to get their power !!! If the BLM lets this go thru then your nothing more than a organization of land prostitutes in my opinion!!!!!! We are also in a drought if you have not noticed and they want 1,000,000 plus gallons of our precious resource of water just to mix concrete for these eyesores ! Why should Idahoans be forced to have these hideous , oversized ugly things in our back yard ?
Individual	OPP01 - 1 - General	This is to inform you that I am strongly opposed to the further development of the Lava Ridge Wind Project.
Individual	OPP01 - 1 - General	I want to voice my opposition to the proposed wind farm
Individual	OPP01 - 1 - General	Learned just yesterday of this project proposal and this is in my backyard. Seeing that other states want to destroy Idaho land for their benefit does not help Idaho or its residents. I could go into specifics but I am sure you have gotten more emails about them. I just definitely do not want these basically in my back yard. Would you?
Individual	OPP01 - 1 - General	Please add my name to the list of Minidoka County residents opposed to the Lava Ridge wind farm. I will not detail why I am opposed since this is for voting purposes only. In addition I am requesting to be added to the list of persons requesting continuation of detailed information.
Individual	OPP01 - 1 - General	This would be horrifically destructive in so many ways. Is money the only thing important now. No windmills
Individual	OPP01 - 1 - General	I have lived in the Magic Valley for the past 30 years. I strongly oppose this wind turbine project. Please get it stopped.
Individual	OPP01 - 1 - General	Within the very large direct and indirect footprint of the proposed project, I am very concerned about potential direct and indirect/viewshed impacts to the following specific categories of resources: the wildlife that has adapted to this arid landscape: bats, birds, antelope, mule deer, and pygmy rabbits, and the native insects, small mammals, and plants that they rely on; natural features of the landscape such as lava tube caves, rocky ridges, and low buttes, ephemeral ponds, and water resources flowing through historic canal systems, which are important to wildlife and people, alike; impacts cultural resources such as the Minidoka National Historic site, Wilson Butte Cave and other lava tubes, archaeological sites reflecting a rich local human history of more than 15,000 years, resources and landscape features important to contemporary Native American people, and historic sites and National Register properties located in the surrounding area (e.g., Rock Creek Station and Stricker Homesite on the Oregon Trail, Lava Rock Structures and other historic properties in the ranch and farmlands in Jerome and Lincoln Counties; Craters of the Moon National Monument, Hagerman Fossil Beds National Monument, Minidoka National Wildlife Refuge, Lake Walcott State Park, Shoshone Falls Park, and the Twin Falls Visitor Center; Central Idaho Dark Sky Reserve, International Dark Sky Park at Craters of the Moon National Monument, and local astronomical observatories at the Faulkner Planetarium and Bruneau Dunes State Park.
Individual	OPP01 - 1 - General	I whole heartedly oppose the Lava wind project as it will destroy our natural beauty and does not produce power when the wind stops or the ice destroys the equipment. Abandon the project NOW!
Individual	OPP01 - 1 - General	Still expressing my opposition to this wind farm on the last day for public comment.
U.S. Environmental Protection Agency	P&N01 - 1 - Agencies Purpose and Need	EPA recommends that the Draft Environmental Impact Statement (DEIS) clearly identify the underlying purpose and need for the proposed project. When formulating the need, identify and describe the underlying problem, deficiency, or opportunity that the action is meant to address.
Idaho Conservation League	P&N01 - 1 - Agencies Purpose and Need	The BLM can support this updated purpose and need by including a comparison of the viability of different alternative renewable energy technologies in addition to the proposed action. Mapping by the National Renewable Energy lab shows the potential energy generation by solar or wind is roughly equivalent in the project area. Industry standard assessments of project costs show that wind and solar cost produce energy for about the same price. We encourage the BLM to adapt the purpose and need to reflect your priorities to provide for a new economical and reliable renewable energy source and enables the consideration of a reasonable range of alternatives, including solar panels and batteries.
U.S. Environmental Protection Agency	P&N02 - 2 - Applicant's Interest and Objectives	EPA also encourages BLM to include in the DEIS: A discussion on the proposed project in the context of the larger energy market that the project will serve; Potential purchasers of the power produced; Data showing how the project will assist the state, as well as other potential purchasers of the energy, in meeting their renewable energy portfolio standards and goals; and A description of criteria used to determine the minimum project size that will be considered feasible.
Idaho Conservation League	P&N02 - 2 - Applicant's Interest and Objectives	According to Magic Valley Energy/LS Powers Plan of Development, the purpose and need for this project is to reliably and economically produce renewable energy with wind turbine generators for delivery to power markets in the western United States. We believe the purpose is written too narrowly and inappropriately limits the Plan of Development. According to the Federal Register, the need for the BLMs action arises from FLPMA, which establishes a multiple use mandate for management of Federal lands, including systems for generation, transmission, and distribution of electric energy (FLPMA Title V). The BLMs Shoshone Management Framework plan does not limit the types of energy projects the BLM can consider. We note the Plan of Development also states the project

Commenter	Comment Code	Comment Text
		will provide a new economic and reliable renewable energy source.[.] The BLM can clarify the purpose and need statement to consider a broader range of alternatives that meet the agency's resource management goals, including the Biden Administrations 25 gigawatts of clean energy on public lands by 2025 initiative.
Idaho Conservation League	PALE01 - 1 - General	Paleontological resources: There may be unique fossils such as lava tree molds within the project area. Project surveys and micrositing of infrastructure should ensure that such unique features are preserved.
Individual	PROJ01 - 1 - General	Why don't you just post a map? That's what everyone wants to see.
Idaho Office of Energy and Mineral Resources	PROJ01 - 1 - General	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. Decommissioning - Project reclamation plan should provide comprehensive specifications and methods to optimize habitat restoration in the Project Area's relatively harsh and arid climate. - Revegetation of native and desirable seed mixes/plantings, weed control (including invasive annual grasses), wildfire risk management, post-restoration monitoring, revegetation maintenance, and contingencies for reestablishing failed seedlings/plantings. - Multi-year maintenance of restoration efforts (e.g., weed control, reseeding, etc.) following decommissioning would likely be needed to ensure successful Post-project habitat restoration.
Individual	PROJ01 - 1 - General	15. With 243 miles from L.V. to Ely, and 204 miles from Ely to Jackpot, and 268 miles from Ely to Jerome, Why here?
Magic Valley ATV Riders	PROJ01 - 1 - General	Unless technology has changed, the lifespan for the blades results in no recyclable use. Then there is the problem of annual maintenance and potential environmental disaster with oil leaks and even worse, turbine fire.
Individual	PROJ01 - 1 - General	Let's say in 20 years the turbines are at the end of there useful life, then what? They are on public land, who is going to clean up the mess? Are the investors going to set aside a multi-million bond to cover cleanup? How are these scares and some hazardous materials going to be cleaned up and recycles?
Individual	PROJ01 - 1 - General	1.The BLMs Wind Energy Final Programmatic EIS lists this area as a low wind area. How does a wind project make sense here? Would this Project be economically feasible without the federal government renewable energy subsidies?
Individual	PROJ01 - 1 - General	With this equipment having a useful lifespan of around twenty years is does it make sense to build it knowing that new technologies are being developed that will make these projects obsolete in a short time? The estimate of temporary land disturbance for the Lava Ridge project is ten or eleven thousand acres or about ten percent of the project area with about 3 or 4 precent being permanently disturbed or altered. Rehab of these areas will take years with such a short project lifespan and possible decommissioning or equipment replacement will these areas ever properly recover or do we just resign these lands to become a weed patch for the next twenty-five years.
Individual	PROJ01 - 1 - General	Decommissioning what will be left when the wind turbines are decommissioned (underground lines, concrete bases?) How will the turbines themselves be disposed of and where?
Individual	PROJ01 - 1 - General	Fourth, as this project is on Federal Land, the state of Idaho receives little benefit for hosting the site and actually gives them our precious well water. The power generated is to be moved out of state. And when the project ages, who cleans up, what will be reclaimed? My fear is that our children will get to see a large dump. Remediation must be included!
Individual	PROJ01 - 1 - General	3. Full End of Life Remediation must be included at the beginning so that it doesn't languish when the time comes that it is needed.
Individual	PROJ01 - 1 - General	I have many concerns over the 40 acre battery location, development and long-term maintenance and decommissioning. It seems there are very few details on this portion of the project. What happens to the spent battery cells? Electrochemical batteries don't last forever. Will those go to idaho landfills? Who will pay for that?
Individual	PROJ01 - 1 - General	The decommission plan did not detail the proper abandonment of the wells. I didn't see a long term monitoring and additional revegetation efforts in locations that have failed to establish. It is common for desert plants to fail to thrive once disturbed. Monitoring and additional efforts are greatly needed for slow growing desert plants.
U.S. Environmental Protection Agency	PROJ01 - 1 - General	Because construction of the project will involve development of access roads, establishment of staging yards, as well as power transmission infrastructure, EPA recommends that the DEIS for the project: Describe all areas of the project footprint that will be disturbed for the project to be operational. - Quantify temporary and permanent impacts anticipated, including acreages and level of disturbance; - Amount of cut and fill needed and soil to be moved; and - Identify how fill will be stabilized.
U.S. Environmental Protection Agency	PROJ01 - 1 - General	As the proposed project has the potential to impact many environmental resources for an extended period, EPA recommends that the project be designed to include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The DEIS document will need to describe the monitoring program and how it will be used as an effective feedback mechanism so that any needed adjustments can be made to the project to meet environmental objectives throughout its lifespan. For example, there could be a plan to monitor birds and bats strikes and take corrective action if the strikes pose risks to declining bird species populations of the area.
Individual	PROJ01 - 1 - General	I also know there are wind turbine blades being decommissioned and buried in the ground in parts of Wyoming and Montana. Is this what we want to happen in 20-25 years to our public ground? NO, I know these turbines will not be decommissioned in a favorable manner, they will more than likely be buried somewhere out in the desert.
Individual	PROJ01 - 1 - General	During the September 9, 2021, Lava Ridge Wind Project (LRWP) public scoping meeting the Magic Valley Energy LLC (MVE) representative was very evasive, in my opinion, when responding to a question by someone in the audience (not me) about who were the investors in this project (or how the investors might benefit from this project). I do not recall the MVE representative saying that Magic Valley Energy LLC is a unit of LS Power, or that LS Power is a New York City based private equity firm which appears, both from its web site and the LRWP Plan of Development (POD), to raise its capital through private investors. Funds raised by publicly traded companies are one thing, funds raised by private equity firms for projects on public lands are quite another. Since this project, if approved, would become part of the electrical grid critical infrastructure it seems to follow the project also would have national security implications. Based on the POD, it appears MVE will raise the capital needed for this project with administrative fund-raising support furnished by LS Power. Has the project fund raising been done? It appears this will be private equity fund raising venture. How does BLM know who the private investors are (or will be) and whether or not those investors, or their companies/countries, might be considered potential national security threats by the US Government? If the fund raising occurs after a Right of Way (ROW) permit is issued, how will BLM ensure investors do not pose potential national security concerns to the project? If potential national security questions come to light during the financial analysis, how will BLM deal with that? There is also the issue of land ownership. On page 24 of the LRWP POD LS Power notes real estate rights are one of the strong points of its purported strong financial position. This project is proposed to be built on public land. How will BLM protect public land ownership rights (and related rights) if a Right of Way (ROW) permit is issued? Because of the above, I am asking BLM evaluate this project not only from the financial viability perspective but also a national security perspective because of the possibility of foreign investment in the project which is not transparent because it is a private equity funded event. I ask also that BLM conduct an intense financial evaluation, more than what BLM would normally conduct of publicly traded companies, of both Magic Valley Energy LLC and LS Power to include financial evaluations of the individual investors who will be funding this project and the claims made in the POD, page 24. Perhaps including full background investigations of the parties investing in this project might be appropriate since the project might, if approved, effect national security. There is precedence for intense financial reviews by Federal agencies. The Tamarack Resort project in Valley County, Idaho in the early 2000s was financially evaluated by the US Forest Service (USFS) because the project involved at least partial use of USFS managed land. USFS issued an opinion that the developers did not have sufficient financial means to complete the project. The project was later partially built, before it filed for bankruptcy, on non - USFS property. As I recall the developers were privately funded. Please acknowledge receipt of this email.
Individual	PROJ01 - 1 - General	How many miles of roads will be built for this project?

Commenter	Comment Code	Comment Text
Individual	PROJ01 - 1 - General	Another issue I recently found out is once a wind mill is mothballed if it's on private property it's the property owners responsibility to demo it or deal with it. Since this is public land and a private company who will be stuck with the liabilities once they are out dated? According to a web site called peckford 42 it takes 900 tons of steel, 2500 tons of concrete and 45 tons of plastic for one wind turbine. Now times that by 400 and that's a lot of cleanup. Who will pay for that? Do you have that answer?
Idaho Conservation League	PROJ01 - 1 - General	The project will require the construction of 381 miles of permanent roads and a large number of temporary routes and work yards. The Plan of Development denotes the amount of roads in terms of acreage, but for public understanding, the DEIS should also list the total mileage of the different types of roads to be constructed, including crane paths. Some changes to existing intersections will likely be needed to accommodate longer vehicles and heavier loads.
Idaho Conservation League	PROJ01 - 1 - General	<p>Due to the nature of the lava features on the landscape, shallow soils and low precipitation, it will be unlikely that reclamation efforts will completely restore the landscape to its original conditions. The effects of the roadwork and clearings are likely to become permanent features on the landscape. We recommend that the BLM take reference photos of the proposed corridors now so they can use them during site reclamation to approximate the original conditions. We recommend restoring the original topography, rock type, rock color, soils and native vegetation to the original conditions where practical. There may also be the opportunity to retain some of the roads following project completion if they can serve as a better transportation or recreation system route than the current road conditions. Any adoption of these routes should factor in wildlife and non-motorized recreation interests.</p> <p>Given the sparsity of deep soils and well developed topsoils in much of the project area, we recommend that Magic Valley Energy/LS Power start now to accumulate and store topsoil which can be used for eventual reclamation efforts. We also recommend investing now in seed collection and rearing of local varieties of native plants in greenhouses for eventual reclamation efforts. If operations at this site are renewed and reclamation efforts are not needed in thirty years, it is likely that there will be other restoration needs in the region for which the soils and native plants could be utilized.</p> <p>For eventual project reclamation, site preparation, replanting and revegetation efforts should be protected from adverse impacts from livestock grazing and off highway vehicles until the desired vegetation is well established.</p>
Individual	PROJ01 - 1 - General	How long are the windmills good for? What happens to them when they are no longer functioning?
Individual	PROJ01 - 1 - General	To begin, I want to express my general concerns regarding the size and scope of the Lava Ridge Wind Project. As described in initial scoping documents and meetings, the Project as proposed would be one of the largest in the Nation and certainly the largest in the State of Idaho, consuming a very significant portion of all public lands within Jerome County and a smaller percentage of those in Lincoln and Minidoka Counties. The direct footprint of ~119 square miles, where 400 turbines, hundreds of miles of new access roads and powerlines, multiple new substations, staging and laydown areas, and met towers are proposed is concentrated within a much larger area of approximately 351 square miles, where indirect impacts such as expanded gravel pits, wild land fire fuel breaks, vehicle traffic, new fences, use of scarce water resources, dust abatement, weed invasion, increased use of pesticides and rodenticides, expanded housing developments, light and sound pollution, shadow flicker, visual intrusions, and a myriad of other disturbances will combine with project infrastructure.
Shoshone-Bannock Tribes	PROJ01 - 1 - General	the Tribes would also request the NEPA document completely evaluate the closure plan for this proposed facility and the rehabilitation of all disturbed areas at the completion of this project at the end of the lease term.
Individual	PROJ02 - 2 - Materials/Supply Chain	<p>Additionally, I think that the negatives from wind farms out weigh the positives. The blades degrade and delaminate in a relatively short amount of time, resulting in the giant blades going right to landfills. Low frequencies disrupt local animals and humans, and the swinging blades kill many birds.</p> <p>Between the energy required to make all of the components, lack of ability to reuse the blades, and fossil fuel support components, I just don't see wind-mills as a 'green' option for mass energy production.</p> <p>Finally, the sustainment costs for these wind farms is quite high.</p> <p>I would support an alternate energy project but not a wind farm in the beautiful state of Idaho.</p>
Individual	PROJ02 - 2 - Materials/Supply Chain	<p>I am AGAINST this project. It is futile:</p> <p>James Hansen, the former NASA climate scientist, wrote in 2011: Suggesting that renewables will let us phase out rapidly fossil fuels is almost the equivalent of believing in the Easter bunny.</p> <p>The other thing about renewables is that they cannot produce the intensity of heat required to not only build turbines but just about anything else that makes the modern world modern.</p> <p>The material requirements of a modern wind turbine have been reviewed by the US Geological Survey (Wind Energy in the United States and Materials Required for the Land-Based Turbine Industry From 2010 Through 2030). On average, 1 megawatt of wind capacity requires 103 tonnes of stainless steel, 402 tonnes of concrete, 6.8 tonnes of fiberglass, three tonnes of copper and 20 tonnes of cast iron. The blades are made of fiberglass, the tower of steel and the base of concrete.</p> <p>Robert Wilson at Carbon Counter takes us through the science. Fiberglass is produced from petrochemicals, which means that a wind turbine cannot be made without the extraction of oil and natural gas. Steel is made from iron ore. To mine ore requires high energy density fuels, such as diesel. Transporting ore to steel mills requires diesel.</p> <p>Converting iron ore into steel requires a blast furnace, which requires large amounts of coal or natural gas. The blast furnace is used for most steel production.</p> <p>Coal is essential, not simply a result of the energy requirements of steel production but of the chemical requirements of iron ore smelting.</p> <p>Cement is made in a kiln, using kiln fuel such as coal, natural gas or used tyres. About 50 per cent of emissions from cement production comes from chemical reactions in its production.</p> <p>Then there is the problem of priming windmills. Large wind turbines require a large amount of energy to operate. Wind plants must use electricity from the grid, which is powered by coal, gas or nuclear power.</p> <p>A host of the wind turbine functions use electricity that the turbine cannot be relied on to generate functions such as blade-pitch control, lights, controllers, communication, sensors, metering, data collection, oil heater, pump, cooler, filtering system in gearboxes, and much more.</p> <p>Wind turbines cannot be built and cannot operate on a large scale without fossil fuels.</p>
Idaho Chapter of Safari Club International	PROJ02 - 2 - Materials/Supply Chain	Further, in spite of the Administrations claim that wind energy is clean, we do not recognize it as such. Production of wind energy requires environmentally-questionable mining for iron, energy-intensive refining and fabrication of wind towers, and the burning of untold gallons of diesel fuel to deliver and erect the structures. This is hardly a zero-emission process.
Individual	PROJ02 - 2 - Materials/Supply Chain	The environmental impact of this project is monumental when you consider the amount and type of materials used in the building and installation of these wind turbines.
Individual	PROJ02 - 2 - Materials/Supply Chain	<p>- Turbines get seized up from cold freezing weather or malfunction.</p> <p>- Turbines are made of plastic and needs lots of oil to keep moving parts to move and function</p> <p>- Turbines end up being burried in the ground when no longer good. Leaving a huge turbine graveyard.</p> <p>And I think I read 400 Turbines are proposed to be built?!</p>
Individual	PROJ02 - 2 - Materials/Supply Chain	7) The demand for concrete is already exceeding the supply. It will only drive pricing higher for the local community and slow down development of housing that is in short supply.
Individual	PROJ02 - 2 - Materials/Supply Chain	- They require petroleum products to function, not such a 'totally green energy source?' What is the end-result after their short life-span? Is there any way or anywhere to recycle these giants? Do they actually ever produce enough energy to off-set their huge cost to manufacture/produce/erect?
Idaho Conservation League	PROJ02 - 2 - Materials/Supply Chain	Should the project proceed, there will be a large need for sand, gravel and crushed rock for construction. The BLM should estimate if areas that will be disturbed by road construction and rock blasting can provide sufficient amounts of this construction material or if additional gravel pits or rock quarries will have to be developed within the project boundaries. If off site material is likely to be needed, the BLM should also describe which off site locations may be utilized and the resulting effects.
Idaho Transportation Department	PROJ02 - 2 - Materials/Supply Chain	<p>Is there enough quality aggregates in the area to supply this size of project? Has the option to import aggregates even been considered? Cost? Origin?</p> <p>What is the quality of the aggregates located within the proposed site? Can they be used for road construction? Can they be used in the production of concrete? Has this even been studied?</p>
Individual	PUBL01 - 1 - General	[attachment is a screenshot of the Q&A feature being "disconnected" - presumably during the scoping meeting]
Individual	PUBL01 - 1 - General	I notice that no one from the Minidoka/Hunt "National Historical Site," U.S. Park Service was invited as a stakeholder/committee member in planning committee.
Idaho Conservation League	PUBL01 - 1 - General	Another critical component will be what additional steps we can take to protect cultural values for Shoshone-Bannock and Shoshone-Paiute tribal members as well as for members of the Japanese-American community. Local communities also need to be engaged in discussions about how to best tailor a project so it is respectful of stakeholder interests.

Commenter	Comment Code	Comment Text
Individual	PUBL02 - 2 - Comment Period/Public Meetings	Is it too late to sign up today? I signed up for the tomorrow meeting.
Individual	PUBL02 - 2 - Comment Period/Public Meetings	I the number of public comments is relative to the show of concern over the proximity of wind turbines to MHNS, this is inaccurate for several reasons. Many people who would like to comment do not have the technology available to participate. Public meetings would fare no better as many are too old to travel on their own to make a public comment. And, most of the people who were incarcerated in MNHS and depicted in my book are now deceased. They are unable to publicly comment. I feel as though my public comment will not make any difference as the tone of the scoping meeting seemed like the Lave Ridge project was a done deal and the gathering of public comments a mere formality.
National Parks Conservation Association	PUBL02 - 2 - Comment Period/Public Meetings	Additionally, moving forward we request that engagement meetings for this EIS or any other stakeholder process involving the park sites include an option for remote participation due to 1) COVID-19 and 2) the majority of survivors and descendants of Minidoka not living in the area.
Idaho Conservation League	PUBL02 - 2 - Comment Period/Public Meetings	We also recommend that the BLM and Magic Valley Energy/LS Power host one or more public webinars to review the comments received. If the project proceeds to completion, we also recommend that the BLM and Magic Valley Energy/LS Power continue to host listening sessions on an annual basis or as needed to respond to community concerns.
Individual	PUBL03 - 3 - Public Outreach/Availability of Info	Your gross oversight in communicating with the Japanese American community has caused the DOI harm that is potentially irreparable. I no longer trust the BLM or National Park Service to do what is just.
Star Lake Grazing Permittees Sid Butte Livestock Association	PUBL03 - 3 - Public Outreach/Availability of Info	We are challenged in providing comment as to ground grazing mitigation, such as grazing practices, seasonal movements, range improvements (e.g., moving fences, water distribution), rerouting access because of our lack of understanding of the precise proposal relative to the Star Lake Allotment, as discussed below. For example, generally speaking, the Notice provides no information as to planning and timing during the construction phase as to each of the Project Component[s] or Wind Structures, see Notice at PDF page 7, except to suggest that the construction phase will be 2-years which we contend is unrealistic. In addition, the Notice provides no information as to planning and timing during the operation & maintenance phase. Absent such information, planning grazing practices, seasonable movements, and range improvements at this early stage is like shooting in the dark assuming there is compatibility between the intended Project and the Permittees continued Permitted Use.
Individual	PUBL03 - 3 - Public Outreach/Availability of Info	Relatively few people were aware of the opportunity to contribute to this public scoping. All of the population of the counties of Jerome, Lincoln, and Minidoka should have been made thoroughly aware. (This land belongs to fil!_U.S. citizens!)
Western Watersheds Project	PUBL03 - 3 - Public Outreach/Availability of Info	Please post the Projects Bat and Bird Conservation Plan and its Eagle Conservation Plan on the ePlanning website during the public comment period for the Projects Draft Environmental Impact Statement. This will allow the public to review and provide input to BLM and FWS on Project measures being proposed to protect avian wildlife, which will help the agencies make a better-informed decision, as is consistent with NEPA and its implementing regulations.
Individual	PUBL03 - 3 - Public Outreach/Availability of Info	7.Lava Ridge intentionally minimized public knowledge for input.
Individual	PUBL03 - 3 - Public Outreach/Availability of Info	My concern is the impact to the historical and cultural landscape as relates to Minidoka National Historic Site. I participated in the online forum on September 8, 2021, and I am seriously concerned about the lack of adequate information for and engagement and consultation with individuals, organizations, and descendants of those incarcerated at Minidoka during World War II. As both a historian on Japanese American history as well as an environmental consultant, I am concerned about inadequate public outreach and engagement which will lead to a flawed and inadequate scoping and environmental assessment. As someone whose extended family was incarcerated at Minidoka, I am a stakeholder.
Individual	PUBL03 - 3 - Public Outreach/Availability of Info	Regarding adequate environmental assessment, the recommendation always is for the public to get involved as early as possible in the process and to ensure they have that opportunity. My experience is that the explanation later in the process will be that "we did not analyze that because it was not identified during scoping." Those associated with the history of Minidoka extend far beyond the notification provided for this project. That is part of the history of eventual migration caused by forced removal and incarceration, as many lost the entirety of their property and were unable to return to their former home. It also is a function of time over the past decades. As stated in my earlier public comment [September 8, 2021], there does not appear to have been a comprehensive effort to identify Japanese American or historical and descendant organizations to gain their participation early in the scoping phase. The public outreach appears to have been very localized, e.g. local media announcements. The only other notification was published in the Federal Register on August 20, 2021, for which there is no realistic and reasonable expectation that the public would see the notice in time to participate. I also would call your attention to the fact there have been nationally restrictive circumstances which limit participation due to COVID. As stated, the survivors and families of those incarcerated at Minidoka during WWII are scattered around the U.S. and many of the survivors are elderly, as are many descendants. Please do not move forward with a process that prevents them from being heard and from fully understanding the potential impacts. It would be another action that compounds the injustice of WWII incarceration and would not further the SO 3399 goal of transparency and integrity in the process.
Friends of Minidoka	PUBL03 - 3 - Public Outreach/Availability of Info	We were surprised and shocked to see BLMs Notice of Intent in the Federal Register on August 20, 2021. Prior to this NOI, the only contact we had from BLM was a July 2021 invitation to attend a meeting. We were especially surprised by the lack of engagement prior to the NOI in light of LS Powers unsuccessful attempt in 2009 to locate the Southwest Intertie Project (SWIP) 500 KV power line over Minidoka National Historic Site.
Friends of Minidoka	PUBL03 - 3 - Public Outreach/Availability of Info	By overreaching and failing to engage with stakeholders, the Lava Ridge proposal jeopardizes the Administrations goals by generating political controversy, project risk and uncertainty along with delays from possible litigation. In order to avoid a costly and time-consuming train wreck that will detract from the fight for racial justice and clean energy, we encourage BLM to restart the clock and follow Administration policy and the Secretary of the Interiors guidance relating to restoring integrity to the decision-making process. We ask that the BLM have meaningful engagement with the Friends of Minidoka and our partners to develop a new proposal that does not impair Minidokas fundamental resources and values and other important natural, cultural, and historic resources. Meaningful stakeholder engagement involves providing the Japanese American community and other stakeholders with a seat at the table early in the planning process before scoping begins.
Friends of Minidoka	PUBL03 - 3 - Public Outreach/Availability of Info	With the exception of a July 2021 meeting relating to the National Historic Preservation Act (NHPA) Section 106 process, we are not aware of any direct outreach by BLM or LS Power to engage with Friends of Minidoka, our members, and the Japanese community at large. In response to LS Powers proposal, the BLM has an affirmative responsibility to reach out to stakeholders. BLM did not follow Administration policy or process guidance. While the BLM and LS Power provided some public notice in the immediate project area in south central Idaho, we are not aware of any outreach to the Japanese American community located on the West Coast or nationwide before the August 2021 Federal Register Notice. Because of U.S. Government policy during World War II, which destroyed entire Japanese American communities on the West Coast and dispersed families across the country, Minidoka survivors and their descendants are located in communities across the United States. Densho, a Seattle-based non-profit organization, has chronicled this diaspora in its Sites of Shame website. The map below shows where people settled after Minidoka and sought to rebuild their lives against the backdrop of racial prejudice and hate. While many Japanese Americans resettled after WW II in Oregon, Washington State, Alaska and California, many Minidoka survivors and their families live throughout the United States. In order to engage the Japanese American community, we encourage BLM to consider the National Park Services general management planning (GMP) process for Minidoka National Historic Site as a model for public outreach and future engagement on Lava Ridge. In light of COVID, we encourage 5 BLM to consider virtual public engagement meetings with survivors of incarceration sites, their descendants and other stakeholders, along with in-person meetings in the following locations: Twin Falls, ID; Boise, ID; Idaho Falls/Pocatello area; Ontario, OR; Bainbridge Island, WA; Seattle, WA; Portland, OR; and Anchorage, AK; San Francisco, CA; Los Angeles, CA; and Washington, D.C. The NPSs GMP also includes a list of media outlets it reached out to engage the public in the Minidoka planning process.6 We encourage BLM to consider using this list. In terms of engaging with Minidoka and other camp survivors, please note that their ages range from the late 70s, to 80s and 90s.
Individual	PUBL03 - 3 - Public Outreach/Availability of Info	How BLM controls and implements the Environmental Impact Statement process, and LSPs intent and actions are paramount to successful and acceptable outcomes. To analyze and evaluate the Lava Ridge proposal, it is imperative that you embed inclusive and diverse processes to ensure community out reach, and that issues and concerns are thoroughly addressed. Ongoing, open, honest and transparent engagement must be standard through the entire procedures.
Idaho Conservation League	PUBL03 - 3 - Public Outreach/Availability of Info	We encourage the BLM to work with local representatives of the Japanese American community to reach the much broader diaspora of the impacted community. Once camp detainees were released in 1944, some chose to remain in Idaho, settling in the Magic Valley, eastern Idaho, and the Boise area while others dispersed throughout the country. We recommend that the BLM and Magic Valley Energy/LS Power seek out these communities of Japanese Americans whose lives were shaped by the injustices forced upon themselves and their ancestors, and consult with the National Park Service to reduce the potential impacts to the Minidoka National Historic Site. This is not only a matter of NEPA compliance, it is an issue of Diversity, Equity, Inclusion, and Justice that must be adequately addressed prior to construction approval.
Individual	PUBL03 - 3 - Public Outreach/Availability of Info	I only learned today about being able to make comments on this. I wish there had been a flyer sent to residents. I have lived in the Magic Valley for over 30 years and getting local information is the hardest and most frustrating of all.

Commenter	Comment Code	Comment Text
Japanese American Confinement Sites Consortium	PUBL03 - 3 - Public Outreach/Availability of Info	Because the BLM reached out to the Japanese American community only after scoping began, BLM did not engage the Japanese American community early in the project planning process. There has also not been sufficient outreach to Japanese American communities and partners throughout the United States to ensure that those with direct ties to Minidoka, including survivors and descendants of the unjust incarceration, are aware of the Lava Ridge project and its impacts on Minidoka.
Coalition to Protect America's National Parks	PUBL03 - 3 - Public Outreach/Availability of Info	Section 5 of SO 3399 directs: Bureaus/Offices will proactively begin consultation with potentially impacted Tribes, both those currently in the proposed area and those with a historic presence, as well as engage potentially impacted environmental justice communities early in the project planning process. Early in the project planning process includes when a Bureau/Office has enough information on a proposed action to determine that an environmental assessment or an environmental impact statement will be prepared. (Emphasis added.) Obviously, in this case the Nikkei are a community with environmental justice concerns related to this project and therefore must be consulted. However, because BLM did not reach out to the Japanese American community until after scoping had already begun the Bureau has already failed to engage the Nikkei community early in the project planning process. Moving forward, it is essential that BLM fully embrace its consultation responsibilities.
Coalition to Protect America's National Parks	PUBL03 - 3 - Public Outreach/Availability of Info	As mentioned under the Applicable Authorities section above, Secretary's Order (SO) 3399 directs Bureaus [to] proactively engage potentially impacted environmental justice communities early in the project planning process, which is described in the SO as when a Bureau has enough information on a proposed action to determine that an environmental assessment or an environmental impact statement will be prepared. Because the BLM waited until after public scoping began to reach out to the Japanese American community about the proposed action, BLM has already failed to comply with the letter and intent of the Secretary's environmental justice directive.
National Park Service	PUBL04 - 4 - Tribal Coordination	Consultation is needed with federally recognized tribes to identify potential ethnographic resources within the projects Area of Potential Effects (APE), as well as those outside the APE, that may be impacted through construction and operation of the wind turbines and associated infrastructure. Efforts should be made to understand and determine how these culturally significant resources, along with the tribal practices associated with acquisition and use of these resources, may potentially be impacted from the construction and operation of this project. The NPS also recommends consultation focus on the projects potential for adverse impacts on Native American use of, and the religious and spiritual values associated with, known Indian sacred sites within or near the projects area of effect. The NPS recommends consulting with the Northern Paiute and Shoshone-Bannock Tribes about potential impacts to specific ethnographic resources such as water, plants, and animal species associated with the Lava Ridge project.
National Parks Conservation Association	PUBL04 - 4 - Tribal Coordination	Impacts to cultural resources: We request that BLM conduct nation-to-nation consultation with the Shoshone-Bannock Tribes and all Native American tribes with a cultural affinity for this region. We request analysis of cultural resources including both historic and pre-historic resources and disclosure of that information to the Tribes. NPS, as a cooperating agency, should be consulted with to better understand cultural resources in the region and what impacts this project may pose to them.
U.S. Environmental Protection Agency	PUBL04 - 4 - Tribal Coordination	EPA recommends the EIS for this project describe the process and outcomes of government-to- government consultation between BLM and all tribal governments and communities that will be affected by the project; issues that were raised, if any; and how those issues will be addressed. See Executive Order 13175, Consultation and Coordination with Indian Tribal Governments.16 As a general resource, you may also consult the Best Practices in Historic Preservation document to address this topic
Idaho Conservation League	PUBL04 - 4 - Tribal Coordination	We understand that the BLM has already initiated consultation with the Shoshone Bannock and Shoshone Paiute Tribes through a government to government relationship regarding this project. The BLM should determine if any Traditional Cultural Properties, sensitive natural resources integral to cultural identity, or sites that fall under the purview of the Native American Graves Protection and Repatriation Act are within the proposed project area. Potential tribes to include in this consultation include, but are not limited to: The Shoshone-Bannock Tribes of the Fort Hall Indian Reservation, the Shoshone-Paiute Tribe of the Duck Valley Reservation, the Confederated Tribes of the Umatilla Indian Reservation, and other Shoshone-Paiute peoples. These efforts must extend beyond a single letter asking if the Tribal governments are interested in participating in a cultural consultation, as has been the case for previous large projects throughout the West.
Idaho Conservation League	PUBL04 - 4 - Tribal Coordination	We encourage the BLM and Magic Valley Energy/LS Power to work to better understand tribal concerns and identify issues or locations of concern, sometimes without learning the exact location of identified resources or TCPs as these locales may fall under cultural identity protective status. While this may make consultation and protective efforts more difficult, it is important to recognize and acknowledge past wrongs and a certain degree of mistrust that First Nation peoples may feel regarding the release of protected information, tribal history, and cultural identification.
Individual	PUBL06 - 6 - Scoping	Button is not working on the BLM site. It will take you to the documents, but there is nowhere to put comment. No submit button. I tried it in two different browsers: Safari and Chrome. This is highly problematic. I hope that you can have this fixed.
Individual	PUBL06 - 6 - Scoping	Thank you so much for your prompt reply. I'll pass this on to others in the community. Thank you again for the extension and your attention to detail for this project
Idaho Conservation League	PUBL06 - 6 - Scoping	The BLM should release the summary of scoping comments as soon as it is compiled and not wait for the rest of the DEIS to be completed to do so.
Individual	REC01 - 1 - General	but it is also an area that us citizens and tax payers , enjoy spending time in doing, such things as hunting, hiking, and riding atvs, seeing all the wildlife that moves in there too survive the winter
Individual	REC01 - 1 - General	We are already restricted from areas of study and now you want to give away 7,800 acres for a wind project. I don't believe the ground where turbines would be built will ever be the same after the construction, times 400.
Individual	REC01 - 1 - General	We have always worried that the desert could become a park and be closed to recreation and that our grandchildren would never have the chance to show their children. Several years ago, they wanted to close the desert to ATV riders so not to disturb wildlife and damage the area. Any small amount of damage over the 100s of years can't compare to the damage that building 400 turbines is going to create.
Individual	REC01 - 1 - General	Lastly I want to know how public land access will be affected and if people will still be able to recreate, and hunt in this immediate area.
Idaho Office of Energy and Mineral Resources	REC01 - 1 - General	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. -Parks and Recreation -Impact on off-highway vehicle (OHV) recreation. -Impact on park user experience at Walcott State Park
Individual	REC01 - 1 - General	The impacts on recreation cannot be understated. This area contains many roads and trail used by standard 4x4 vehicles, ATVs, UTVs, motorcycles, geo cashers, and mountain bikes.
Individual	REC01 - 1 - General	Currently, there are undeveloped roads and trails used by ATVs and pickup trucks. This desert island between the counties offers a close but remote place to play and explore the rocks, caves and hidden canyons between the ridges. Livestock has co-existed with the recreation since the first settlers. Add 380 miles of roads and whining spinning wind mills and the area will be overrun with recreation and livestock alike the loser. Vandalism of all kinds, with cattle and sheep being harassed and even being shot will surely be the result. Any attempt to lock up this vast road and substation network will certainly anger the population and increase vandalism, after it is too late. There has to be hundreds of miles of connecting power lines either over head or buried. It is hard to imagine the effects of all that construction and operation. There is ample access from all directions now. We believe the effects of this massive road, and infrastructure project will ultimately decrease recreation quality, and damage grazing.
Hidden Valley Organic Dairy Farm	REC01 - 1 - General	For generations the area surrounding Kimama Butte and Sid Butte have been used for recreation including horseback riding, hunting, off roading, and driving ATVs. With the installation of the Lava Ridge Windmill Project in our area, the area will no longer be the same. The stillness of the desert will be replaced by blinking lights, traffic, the hum of electricity, and the whoosh of turbine blades. Animals, as shown by the studies mentioned previously in this paper, will abandon the area. Hunting will no longer be possible in this area. You will no longer see a family of skunks crossing the road, hear coyotes howling at night, or watch 2 foxes frolicking in the hay field. Gone will be the days of watching hawks and eagles soar overhead or see herds of antelope leap over fences.
Individual	REC01 - 1 - General	Will this area be closed to public access? This area has been open for hunting, ATV and UTV trail riding, and other types of recreation.
Idaho Recreation Council	REC01 - 1 - General	Wind Energy is a rapidly growing form of renewable energy and it is of no surprise that there is great potential in Idaho. However, developing this project should not mean that recreation should be negatively impacted. The choice does not have to be 'one or the other'. Recreation is important to not only to the quality of life of Idahoans and their visitors but to the economic stability of many communities.
BlueRibbon Coalition	REC01 - 1 - General	The plan proposes up to 400 wind turbines that will be considered critical infrastructure. With the mile wide corridors along with the alternative corridors this will encompass and affect a large area. On the call with Kasey Prestwich, we were told no roads would be closed. However, with the vast amount of equipment and work that is proposed with safety regulations we do not see how roads would not be closed to the public whether it be temporary or permanently. We strongly encourage BLM to balance use for all types of users. This project should not lead to closures for any types of use.
BlueRibbon Coalition	REC01 - 1 - General	We would like to close by saying we support shared use. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHVs often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs. We support any additional comments including route-specific feedback from Magic Valley ATV Riders.
Individual	REC01 - 1 - General	Destruction of public lands. The proposed project is located on 76,000 acres of both federal and state lands with a 10,000 acre footprint. This will significantly affect recreational opportunities in this area. Idaho's outdoor recreation industry generates \$7.8 billion (the 2nd largest industry in Idaho) and supports 78,000 jobs. 79% of Idaho's residents participate in outdoor recreation. The recreational impacts to this region from this proposed project need to be strongly considered
Individual	REC01 - 1 - General	this should not be done, it will close a lot of our riding area

Commenter	Comment Code	Comment Text
Idaho Conservation League	REC01 - 1 - General	This area is utilized by members of the public for a variety of recreation activities. The BLM needs to discuss how public access and recreation may be affected. The BLM should also consider how to address unauthorized OHV use on access roads and within the project area. The BLM should also factor in the popularity of recreational target shooting and the possibility of vandalism of project infrastructure by target shooters. We see the potential need for increased public education and law enforcement in and around the project area. If recreational shooting opportunities are identified as an issue, the BLM could consider designating an official target range in a suitable area. Should any motorized routes be closed as a result of the project development, we recommend improving other existing motorized routes and trailheads as mitigation. Many existing routes do not have sufficient maintenance, signs or trailhead facilities. We do not recommend constructing any new motorized routes for recreation mitigation as project development will already entail a massive amount of new route construction.
Idaho Office of Energy and Mineral Resources	REC03 - 3 - Hunting & Fishing	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. - Hunting - Impacts to existing hunting opportunities for big game (mule deer, elk, and pronghorn) that occur in the Project vicinity, including how public access, roads, and access points would be managed.
Individual	REC03 - 3 - Hunting & Fishing	This area is prime hunting and is used by hunters of deer, antelope, coyotes, rabbits, and small rodents. These will be highly impacted or eliminated.
Individual	REC03 - 3 - Hunting & Fishing	What will the be the impact on the public's ability to use this area of public land for recreation, personal enjoyment and hunting? Is this another way to just keep us from accessing our Public Lands? 73,000 acres of BLM and 3,000 acres of the State of Idaho land is a huge chunk to sacrifice for this project!
Individual	REC03 - 3 - Hunting & Fishing	The area proposed for this wind farm is also wintering grounds for mule deer, elk and antelope. The restrictions placed on our public lands, if this proposal goes through, will ruin our access. We have already experienced this in other areas of Idaho that now have wind turbines. The leased ground is fenced and locked and we have lost our access to those public grounds. The wind farm near the Bennett Hills is proof of this.
Theodore Roosevelt Conservation Partnership	REC03 - 3 - Hunting & Fishing	III. The EIS must study direct and indirect impacts to hunting and fishing opportunity and the Regions outdoor recreation economy. Hunting, angling, and wildlife watching play a pivotal role in Idaho's social and economic strength. In 2016, Idaho's BLM lands saw 466,155 fishing visits, 296,596 hunting visits, and 193,571 wildlife-watching visits, generating \$295 million in sales, \$15 million in state and local tax revenue, and \$18 million in federal tax revenue, while supporting more than 2,550 jobs. There is a strong correlation between Idaho's strong hunting, fishing, and wildlife watching economies and vast unfragmented landscapes. The TRCP worries the proposed project may cause a loss of opportunity for sportsmen in Idaho, both directly and indirectly. The project area lies within IDFG Game Management Unit (GMU) 53 where hunters can pursue game with short-range weapons as well as an archery season from August 30 to December 19. The Lava Ridge Wind Project is proposed to have a footprint of more than 73,000 acres on an extensive tract of BLM-managed land with up to 400 wind turbines and 381 miles of access roads. This level of disturbance is significant and may disturb 22 percent of the total huntable BLM-lands within GMU 53. That will displace hunters, and it could lead to hunter distribution issues in the future.
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	REC03 - 3 - Hunting & Fishing	These public lands are tremendously important for Idaho sportsmen/women and recreational enthusiasts, as well as our diverse wildlife. Our organizations are concerned that the proposed project may cause a loss of quality outdoor experiences and opportunity for sportsmen/women in Idaho, both directly and indirectly. The project area lies within IDFG Game Management Unit (GMU) 53, where hunters have the opportunity to pursue game with short-range weapons as well as a unique, long archery season from August 30-December 19. Additionally, up to 120 tags have been permitted in IDFGs Zone 4B for hunters and falconers to pursue sage-grouse. This landscape offers a substantial amount of big game as well as upland bird and game hunting opportunity close to the Magic Valley region. GMU 53 encompasses 1,176,418 acres, with BLM-managed land totaling 329,397 acres, or 28% of the total acreage. 64% of the land within the GMU lies under private ownership, and over half of the unit is irrigated farmland. The Lava Ridge Wind Project is proposed to have a footprint over 73,000 acres on an extensive tract of BLM-managed land, with up to 400 wind turbines and 381 miles of access roads constructed. This level of disturbance over the total footprint of the project is significant and may wipe out 22% of the total huntable BLM-lands within GMU 53. Given the significant road network proposed with the project, the BLM must consider the compounding effects of pioneered roads and trails from user-created and off highway vehicle (OHV) use stemming off of the 381-mile road network. Route densities can be an indicator of recreation-induced big game disturbance, displacement, and habitat loss causing adverse population-level impacts. Increased route densities will decrease habitat effectiveness (due to fragmentation, introduction of invasive annual grasses, etc.) and shrink available security habitat and, essentially, is a form of habitat loss for big game species. Increased pressure and disturbance from human activity on big game species will inevitably lead to a reduction in hunter opportunity. Given the absence of a travel management plan for the BLM-lands in focus, we are concerned that the road network and user-created routes from the road network will only increase these disturbances, permanently displace wildlife species, and reduce hunter opportunity in the future. A loss in functional habitat for ungulates on BLM-managed land will also cause unavoidable conflicts with private landowners and agricultural producers. GMU 53 cannot support many deer without unacceptable conflicts with agriculture, with depredation complaints already common50. IDFG has documented more than 3,000 mule deer moving into GMU 53 during the harsh winter of 1985-1986, resulting in 54 depredation complaints. The Department has also documented a substantial number of deer-vehicle collisions when mule deer move down into GMU 53 to escape harsh winter years.
Individual	SOC01 - 1 - General	I'm currently a sophomore out at The College of Southern Idaho studying Renewable Energy System Technologies and one of the big focuses in out class is wind turbines. Having a huge wind farm right at our backdoor would not only benefit us as a community but it would also help benefit our program with a bunch of hands on experience involving mechanical drives, hydraulics, climbing, and rigging .
Individual	SOC01 - 1 - General	To not pursue this project is negligent of our regions renewable energy resources and would limit our future development in terms of jobs, energy and capital. This gives us an opportunity to lead the pack in the implementation of clean energy and will allow for us to prosper for years to come.
Individual	SOC01 - 1 - General	Will the electricity produced by the farm lower the cost of electricity to the state's population or will the majority of the power be sold out of state, and if it is outside of the state, how will this benefit Idaho citizens?
Star Lake Grazing Permittees Sid Butte Livestock Association	SOC01 - 1 - General	Relative to a socio-economic impact, as of April, 2021, the value of the Active Use AUMs (aka 17,770 AUMs) in the Star Lake Allotment would likely be \$17.7 million or more, though an appraisal may warrant even a higher figure. The gross annual income generated from the Permittees to support the local, regional, and national economic would likely range between \$12 million and \$20 million, though that does not include the multiplier-effect of such sum within the local and regional economy. The gross annual property taxes paid by the Permittees based upon their base properties and upon other private land is currently at least \$137,000 per year. While we are informed that the intended Wind Project will support 20 employees during the operation / maintenance phase, the Permittees annually employ at least 57 full-time and part- time employees. Thus, it is apparent that the Permittees themselves provide a significant socio- economic input, particularly in the job category. Any temporary or permanent negation or mitigation of the Permittees authorized grazing use caused by the intended project will have correspondently, adverse impacts to at least the local economy.
Individual	SOC01 - 1 - General	Excited for this project! Great use of public lands to help generate a source of renewable energy. Will definitely bring much needed economic growth to the area. It's great that multiple counties will benefit from this installation.
Individual	SOC01 - 1 - General	Where is energy produced going? Is Idaho Power on board with this? Are they being forced to buy this power? The information I've read say windfarms cost more to build and operate than the power they produce. Upside down. Are the same people that want to remove the four lower snake river dams backing this? Sounds like it. Take the wind farms to California if that's where the power is going.
Dietrich School District #134	SOC01 - 1 - General	Construction activity, visual distractions, operational noise and harmonics upon project completion are felt to negatively impact the Dietrich School District in student educational concentration and learning as well as patron financial and social well-being.
Dietrich School District #134	SOC01 - 1 - General	Increased student population and patron activity by the estimated 700 employees and their families during construction is not possible to accurately estimate, however indications are that it is a consequence that could be substantial negative that we cannot properly prepare for.
Individual	SOC01 - 1 - General	Where does electricity go? What does Idaho get paid? Is it an American company!
Individual	SOC01 - 1 - General	I have spoken to you before about the project. I am very apposed. The landscape will dramatically change and it will never be the same. Wind farms are highly inefficient. They are highly subsidized by government taxes so you and I are paying for them. The life span is short for such a large investment. it will not create a lot of jobs after the project is complete. If you think about the millions of pounds of beef that is raised on that grazing it cannot be replaced. There are not a lot of permittees out in the desert but for most of them it is there whole livelihood don't take this away from us.
Individual	SOC01 - 1 - General	We also need to keep production and jobs local. My support for this project is based on those factors.

Commenter	Comment Code	Comment Text
Individual	SOC01 - 1 - General	These windmills should only be put on private lands not public lands so the owners could generate revenue that will be used in this community. Idaho residents should be partners and share profit with these electric companies if these massive beast are what we have to look at for the next 50 years. If this same project were to be proposed in wood river valley I'm sure it would be shot down. Why don't we propose a large natural gas generation plant on the same land to make up for the times the wind don't blow if this project makes it that far.
Individual	SOC01 - 1 - General	The area for the proposed wind farm is, at this time, largely inaccessible. By adding 381 miles of access roads, a large portion of which will be in Jerome County, it greatly increases the area that needs to be patrolled. The roads will presumably be reasonably well maintained to allow for maintenance on the turbines. This will allow easy access into the area for both law-abiding citizens as well as the criminal element wishing to engage in illegal activities out of easy sight of the public and law enforcement. If roads are put in, the public, as well as criminals, will go there. The resources available for policing and responding to emergencies are already limited. Has it been considered yet how the effected counties will be able to staff for this increased draw on our emergency response capabilities?
Individual	SOC01 - 1 - General	MVE (LS Power) claims they deserve to construct a massive (largest in Idaho, near the largest in the nation) wind turbine project in the proposed area. MVE communicates that this project will be highly monetarily beneficial to our communities during the construction period and then lesser so during operation. This company is enthusiastic about providing renewable wind turbine energy by providing (500 kilowatts?) of clean energy to Idaho to help our state achieve it's 2000 mw sustainable energy goal by 2045. MVE claims they can construct and operate this project with minimal impact to the environment. I agree that the growth of renewable energy is a priority for our energy demands. However, I feel that the facts and opinions I have included in my draft exceedingly contradicts MVE's claims of minimal impact to the environment.
Individual	SOC01 - 1 - General	The proposed Lava Ridge windmill project of 400 or more 740' turbines in and around the Dietrich Hidden Valley Community and the surrounding private property will seriously and negatively impact our social and economic well-being. I express the following concerns against the projects approval by the Bureau of Land Management. The possibility of 700 or more workers with their families moving into the area during a two (2) year construction period is a concerning and a difficult impact to deal with. It is presented as a financial plus to the area, however preparing for and dealing with the stated influx is difficult at best. Consideration to the social, economic and infrastructure changes required during the construction period would likely have lingering effects after those workers, families and construction assets leave the area, leaving it to the Dietrich Hidden Valley Community to fund and deal with.
Individual	SOC01 - 1 - General	Economic benefit - nominal in my opinion as crews equipment and expertise come from elsewhere. The resource here is used and the electricity is wheeled elsewhere to market.
Idaho Office of Energy and Mineral Resources	SOC01 - 1 - General	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. - Socioeconomic - Effects on local tax base and personal income within the Project area including Jerome County, Lincoln County, and Minidoka County. - Analysis of both traditional market values for goods, housing, and services, as well as nonmarket services impacted by the project. - Impacts to property value in adjacent areas.
Individual	SOC01 - 1 - General	1. What is the final cost per KWH produced? 2. If all the Government incentives and tax credits are not included what is the cost of the KWH produced? 3. What has the IPUC said about the project? 4. What has Idaho Power said about the proposed project? 5. What is the lifespan of the Windmills, and what the plans and grantees at the end? 6. Could this project be feasible as a stand alone without "green new deal" or other Government programs? 7. How does the private line from Los Vegas to Jerome time into the grid and will that not involve other energy sources? 8. Do these units require input energy from other sources at any time? 9. What is the stable source of energy when the wind isn't moving the turbines? 10. Why not solar? What are the comparisons?
Individual	SOC01 - 1 - General	The bottom line is, the only people who will benefit from this project is the investors.
Individual	SOC01 - 1 - General	Estimated tax benefits to the state of Idaho for this project is around \$4,000,000 a year. Most of this money won't come back to the Jerome or Lincoln counties. But the damage to county roads and infrastructure could be great. Hubert Shaw in talking with his local highway commissioners, learned that they have grave concerns about damage to local roads and bridges from oversized loads. Some further stated they would not allow passage of these loads.
Individual	SOC01 - 1 - General	LS Power is not a local company. The power produced will not be used in Idaho, it will be sold out of state. This project is not multiple use friendly; it will be a 130,000-acre private power production facility on public land used to enrich an out of state company and produce power for out of state interests. The federal government may benefit from right of way fees, but the citizens of Idaho lose.
Individual	SOC01 - 1 - General	This proposed project seemingly only directly affects a few families forced to live in and around the immediate location of the wind turbines. However, we believe Lava Ridge will adversely alter the social and economic condition of Lincoln and surrounding counties. While the carrot of increased tax revenues sounds good on the surface, we believe that the increased costs of services including local schools will exceed the added tax revenue. There will be increased, pressure on schools, law enforcement, emergency services, housing, labor and more. Reliable studies of these issues should be examined. The surge during construction will create a boom which can only be followed by local recession. The product of this project will be high-cost electricity that benefits no one in Idaho and, while not being governed by the Idaho Public Utilities Commission, may ultimately find its way in to the cost of the citizens power rates causing their power bills to rise. Idaho Power that serves most of this part of Idaho says they don't need or want the power. Why do Idahoans need to upset the social and economic conditions that are already growing at a break neck speed to profit New York billionaires. Idahoans should listen to Idaho Power and not take the bait. Social and economic conditions will be tipped on its head
Individual	SOC01 - 1 - General	The possibility of 700 or more workers with their families moving into the area during a two (2) year construction period is a concerning and a difficult impact to deal with. It is presented as a financial plus to the area, however preparing for and dealing with the stated influx is difficult at best. Consideration to the social, economic and infrastructure changes required during the construction period would likely have lingering effects after those workers, families and construction assets leave the area, leaving it to the Dietrich Hidden Valley Community to fund and deal with.
Individual	SOC01 - 1 - General	One cannot put a price on unlimited access and the 100-mile view sheds that we are privileged to have. The high desert is rich in wildlife, tranquility, and solitude. Most of us do not take offense at a loss of this resource when the community realizes a significant benefit. But proposed economic benefits of this project to the local communities are minimal at best. It is highly likely that the energy generated from this project will not stay in Idaho. At this time Magic Valley Energy's literature and informal public information forums have not convinced me that this project will have a net benefit to the citizens of Minidoka, Lincoln, or Jerome counties. As this is public land, fees collected from the revenue of this will largely go to the BLM, not the counties. In addition, there is no conclusive evidence that Wind Turbines produce reliable sustainable energy in relation to their disproportionate disturbance and destruction to habitat.
Hidden Valley Organic Dairy Farm	SOC01 - 1 - General	Livestock is the lifeblood of our community. Ranchers, dairyman, and farmers all rely on their animals to support their families and the local economy. If the installation of the proposed industrial wind turbines causes mass death and reproductive problems like those explained in these stories, our community will never be the same. Many families would go out of business and have to leave the area.
Hidden Valley Organic Dairy Farm	SOC01 - 1 - General	This windfarm will not only cause health problems in nearby people and animals but will also negatively affect our communities and local economy.
Hidden Valley Organic Dairy Farm	SOC01 - 1 - General	The results of this windfarm will not be positive for our area, especially for those who enjoy recreation, or even depend on the desert for their livelihood (like ranchers).
Individual	SOC01 - 1 - General	We strongly object for numerous reasons: 1. Access to the proposed BLM ground will de-value ours and our neighbors land. 2.The tax revenue promised from Lava Ridge to the effected three county's is "pennies" to the overall county revenue.
Individual	SOC01 - 1 - General	6.There is no possible way that our community can meet the needs of Lava Ridge concrete to construct the towers.
Individual	SOC01 - 1 - General	10.Lava Ridge representatives told us that private property owners would be paid "alot of money" to take private property in order to widen roads and access irregardless of the private property owners permission.
Individual	SOC01 - 1 - General	The damage to the Idaho environment threatens the Idaho outdoor economy which is based on scenic wonder. Is it a fair trade-off to degrade the Idaho outdoors so that private equity monies of LS Energy can siphon off huge profits at the expense of Idaho? It does not make sense.
Individual	SOC01 - 1 - General	Suppose the hum or the whoosh were to become proven to be detrimental to human health. And suppose public outrage was sufficient to shut down the LRWP as happened, for example, with the shutdown of the asbestos industry. MVE would declare bankruptcy, but who would have to clean up the mess? As in the case of superfund sites, it is the general public that has to pay the bill.

Commenter	Comment Code	Comment Text
Individual	SOC01 - 1 - General	Increased traffic in the area and impact from other industrial development such as transmission lines and multiple miles of roads which will need to be built will affect the rural character of the involved counties. The energy produced will have great local impact but won't be used locally but will likely be transmitted to metropolitan areas in California, Nevada and Oregon.
Individual	SOC01 - 1 - General	Will the people that come want to be contributing members of our communities or a burden? Is there enough available housing and services for more people. This project will also impact the amount of crime which according to the news is already increasing. More people, more crime, and more types of crime. The use of our limited resources in the building of these massive windmills will drive up even more the already inflated prices of concrete, gravel, gas, and diesel which could reduce the availability of these supplies for projects such as roadways, home construction and other local plans for development.
Individual	SOC01 - 1 - General	The second reason I'm against it, is once it is completed the power generated is for California use only. If they need more power, have them build it in California.
National Parks Conservation Association	SOC01 - 1 - General	Impacts to local communities: We request an analysis of impacts to local communities. Will the construction of this wind project negatively affect property and ranch operations in the area?
National Parks Conservation Association	SOC01 - 1 - General	The EIS must also rigorously explore cumulative impacts of the proposed project on tourism and visitation to Craters of the Moon and Minidoka. Social and economic impacts, such as impacts to visitation, tourism and revenue to a National Park System unit, are environmental effects for purposes of NEPA analysis. See 40 CFR 1508.8 (Effects include ecological, aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative.).Protected public lands such as national parks can play an important economic role for local communities. The economic benefits of national parks extend beyond tourism. The greatest value of natural amenities and recreation opportunities often lies in the ability of protected lands to attract and retain people, entrepreneurs, businesses, and retirees. According to National Park Service visitation data, Craters of the Moon and Minidoka received a combined 285,871 visits in 2019. Visitation for both parks has been steadily increasing over the past decade. BLM must consult these data and consider trends in visitation and how the proposed project would affect those trends.
Individual	SOC01 - 1 - General	I'm confident these huge corporations will not contribute any support for the local schools or communities. We live in a unique area that we have chosen, we are 30 miles to Paul and 45 miles to Twin Falls. Traveling both directions causes some hardship, but I love living in the secluded area we have chosen to live. 400 plus wind turbines with red flashing lights will destroy everything great about the area I live in. I strongly oppose wind turbines in my area, they will cause nothing but grief for me and my employees. We will have numerous trespassers driving around my private property and this usually leads to vandalism and property damage. We have enough trouble with hunters and weekend warriors running through fences and leaving gates dropped as it is. With all the new roads and laborers required to build these turbines, we will see a significant increase of traffic and trespassing. I would think the BLM would want to be a protector of public lands and resources. All over the world government is trying to preserve and protect the land that is left. This project will destroy thousands of open acres of pristine cattle grazing land and hunting. I can see no positive outcome for the area I live in and the surrounding communities. Our small towns of Dietrich and Shoshone will receive very little financial upswing during construction and operations after. Both towns are too small to service a work force of the size they are projecting. So instead of having any increase of revenue it will be passed on to larger towns with services that they can supply. Why would any person in Lincoln County want 400 wind turbines standing anywhere from 450 to 750 tall with red blinking lights on all night long. I would hope the BLM would take note of the citizens in this community and not let a promise from a big out of state corporation persuade them to sell out the local community.
Individual	SOC01 - 1 - General	Why would you want to destroy the desert habitat in our small county for a company that doesn't represent or have any interest in Idaho or the local communities. Our local cattleman graze this ground and provide jobs, tax revenue, and community support in all they do.
Idaho Conservation League	SOC01 - 1 - General	The Plan of Development indicates that construction peak will require 400 to 850 employees. We are supportive of the priority to source this workforce locally, however we are concerned about the strain that this large number of short-term employees could have on the local communities in the surrounding area. Upon completion, the Plan of Development estimates only twenty on-site employees will be necessary to run the wind facility. If largely unplanned, the difference between short-term peak construction workforce and long-term operations and maintenance workforce could have a boom and bust on the local social and economic systems in these communities. Magic Valley Energy/LS Power should work with the local municipalities to ensure that traffic, housing, food systems, and other local infrastructure will not suffer from a boom and bust associated with a short-term influx and exit of the construction workforce in the area. We encourage carpooling and busing for employee shifts. We hope that Magic Valley Energy/LS Powers investment in Lava Ridge will support sustainable and long-term well being for the community that goes beyond the temporary boom associated with the construction period.
Individual	SOC01 - 1 - General	How many of they 700 jobs will be for local residents and how many will be contractors that come in with their own labor force? Does any of the energy stay here and lower our already low power rates? How does this energy contribute to our local economy?
Idaho Transportation Department	SOC01 - 1 - General	The size of this project, the amount of raw material needed for construction could potentially have negative impacts on the local markets and future road costs. The economic impact on the cost of raw aggregates in the production of the concrete and roads needed in the construction of this project needs to be evaluated. Will this project create an increase in local costs of aggregates or concrete? Where will the aggregates come from for the construction of the roads and concrete in this project? What is the availability of aggregates and concrete (cement, aggregate, sand, fly ash, concrete additives) in cubic yards or tons? What percentage of the local aggregates will be consumed? What percentage of local aggregates will still be left for local projects?
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	SOC01 - 1 - General	V. The EIS must disclose direct and indirect impacts to sporting opportunity and the Region's outdoor recreation economy. Hunting, angling, and wildlife-watching play a pivotal role in Idaho's social and economic strength. In 2016, Idaho's BLM lands saw 466,155 fishing visits, 296,596 hunting visits, and 193,571 wildlife-watching visits, generating \$295 million in sales, \$15 million in state and local tax revenue, and \$18 million in federal tax revenue, while supporting over 2,550 jobs ⁴⁹ . There is a strong correlation between Idaho's strong hunting, fishing, and wildlife watching economies and vast unfragmented landscapes
Individual	SOC01 - 1 - General	This project encompasses the public land, known as the Sid Butte, Star Lake, Wild Horse, and North Milner allotments, in which I hold sheep grazing permits. As a permittee and third generation rancher, I have considered several site specific-issues related to this project. I have also carefully analyzed and considered how this project might impact my sheep operation. These considerations are based off my education and from owning and managing my own large sheep and cattle operation. As a result of my analysis, the Lava Ridge Wind Project has the potential to have a substantial negative impact on my ranch operation. In fact, it has the potential to destroy my ranch operation, which is my sole livelihood and only means available to support my family.
Shoshone-Bannock Tribes	SOC01 - 1 - General	The APE includes significant agricultural resources and the Tribes would like to request specific details in the Socioeconomic sections on potential impacts to the surrounding agricultural practices and/or communities.
Shoshone-Bannock Tribes	SOC01 - 1 - General	The Tribes encourage the Bureau of Land Management to explore other options for the generation and transportation of power that sustain local communities. While the project has the potential to improve the generation of electricity in our region, if that consumption is directed to far flung comers of the West, through the grid, and not helping communities closest to the impacted landscape then the benefit of that project is greatly reduced. The lands selected are 'public lands' that are intended to serve the 'public interest', so projects that are implemented on those landscapes should inure to those who live in the shadow of those developments.
Hidden Valley Organic Dairy Farm	SOC02 - 2 - Private Property	All over the country as new industrial wind turbines have been erected, property values have plummeted. On a website titled Do Wind Turbines Affect Property Values? published by Forensic Appraisal Group it says, "Our research has shown that when a property's value depends on the viewshed, wind turbines negatively affect property value. That just makes sense. If someone buys a property for its beautiful view, but now that view is filled with wind turbines, it's going to affect the appeal and thus the value of that property." (Eminent Domain, Utility Easements, Complex Analysis, Expert Witness & Impact Studies - Wind Turbines & Property Values, n.d.)
Individual	SOC03 - 3 - Environmental Justice	The above concerns as well as irritating sub-audible and hyper-audible noise along with irritating cyclic electrical vibrations are experienced by individuals near similar wind farms, though overlooked as affecting only a few . However, for the few, being subject to such a forced environment without weighted consideration in the approval processes of entities such as the Bureau of Land Management, who should be representing and considering the quality of life for those few, is somewhat abusive.
U.S. Environmental Protection Agency	SOC03 - 3 - Environmental Justice	If there are populations with environmental justice concerns around or near the analysis area, then the DEIS will need to address the potential for disproportionate adverse impacts to these communities, consistent with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. ¹⁸ You may also consult Executive Order EPAs Environmental Justice Screening and Mapping Tool, or EJSCREEN ¹⁷ , is a starting point in screening communities that may have Environmental Justice concerns within the project area. ¹⁹ For more information on effective public participation in the NEPA process, please also consult the following resources: - Promising Practices for EJ Methodologies in NEPA Reviews; ²⁰ - The Citizen's Guide to the National Environmental Policy Act; ²¹

Commenter	Comment Code	Comment Text
		- Environmental Justice: Guidance Under the National Environmental Policy Act;22 and - Community Guide to Environmental Justice and NEPA Methods.23
Individual	SOC03 - 3 - Environmental Justice	We have seen the proposition for the creation of over 400 new wind turbines and 7 new substations in the Lava Ridge project. While we acknowledge the need for sustainable and clean energy especially in the face of an ongoing global climate crisis, we ask that the solutions to the climate crisis do not come at the expense of the historic and cultural value of the Minidoka site. We ask that the BLM follow the Biden Administrations clear policies and process for renewable energy project siting. As expressed in early 2021, the Administration outlined a very clear policy that supports both racial and environmental justice and clean energy. Administration policy also calls for engaging stakeholders early in the project planning process. Unfortunately, engagment with the Japanese American community has not happened until this late point in the process. Because of the size and location of LS Powers proposal, it jeopardizes and contradicts the Administration's stated commitment to racial and environmental justice and damages our path forward for our shared need for renewable energy. We hope that BLM and LS Power will carefully consider our community's objections to this project to avoid significant uncertainty and delays in the future.
Idaho Conservation League	SOC03 - 3 - Environmental Justice	One of the major components of reaching carbon neutrality for the state of Idaho is to increase the development of clean energy sources. Utility-scale renewable energy projects like Lava Ridge are at the proper scale to begin addressing the inevitable need for renewable energy in the state. However, these renewable projects must fit within the landscape in which they are proposed. The BLM and Magic Valley Energy/LS Power should design this project to not only address the larger climatic impacts but also in a way that recognizes and addresses the local socio-cultural and environmental impacts. Public infrastructure often faces issues of equity and justice. Energy generation can be cited as an example, with coal mines and coal-fired power plants as having disproportionate negative effects on historically marginalized or underserved communities. Some of our most vulnerable communities are those most affected by climate change. By mitigating impacts from climate change, we can try to improve the conditions for many of our disadvantaged communities. Therefore, climate justice should be accounted for when assessing projects for renewable energy infrastructure.
Idaho Conservation League	SOC03 - 3 - Environmental Justice	We also note that failure to advance renewable energy projects to address climate change is also a social justice issue (please see Findings on Disproportionate Risks of Climate Change to Asian Individuals and Pacific Islanders).
Individual	SOC03 - 3 - Environmental Justice	E.O. 14008 also speaks to Environmental Justice as it relates to the siting of power plants and I would argue that the intent of this provisions was not to just focus on the siting or coal and gas plants but also the citing of wind farms overtop of sites that have been set aside to recognize the injustices that were served upon a people because of their ethnicity and heritage. I would find it deeply offensive to have this place, however painful it may be to remember for the families that lived there, desecrated with the installation of wind turbines on the site of the original camp. The impacts of this need to be fully investigated and quantified by the Idaho State Historic Preservation Office, the National Park Service, the organizations that have been established to advocate for the Minidoka NHS, the Friends of Minidoka, and the Japanese American Community at large.
Coalition to Protect America's National Parks	SOC03 - 3 - Environmental Justice	Comment # 2: Nikkei survivors and their descendants are a distinct community with environmental justice concerns related to this project. The DEIS should include an environmental justice analysis; and NPS should prepare that analysis because it has special expertise regarding the history and injustice of the Nikkei internment. First and foremost, BLM should recognize the 120,000 Nikkei who were unjustly incarcerated at the 10 internment camps operated by the War Relocation Authority during World War II, as well as their descendants, constitute a community with environmental justice (EJ) concerns under applicable federal guidance. That guidance includes: Executive Orders 12898 and 13985; Secretary's Order 3399; and the Federal Interagency Working Group on Environmental Justice & NEPA Committees 2016 report titled Promising Practices for EJ Methodologies in NEPA Reviews. In terms of preparing an environmental justice analysis for the DEIS, we call your attention to the CEQ NEPA implementing regulations at 40 CFR 1501.8(b)(3).22 This section provides that the lead agency in a planning process (in this case BLM) can request that a cooperating agency (NPS) assume responsibility for developing information and preparing environmental analyses [for] portions of the environmental impact statement concerning which the cooperating agency has special expertise. NPS clearly has special expertise regarding the history and injustice of Nikkei incarcerations at Minidoka and other internment camps and the long lasting impacts that experience has had on the Nikkei community. On the other hand, apparently BLM has no direct or ongoing relationship with the Nikkei survivors and descendants; and based on this proposal also seems to have little knowledge or appreciation of the national significance of Minidoka NHS and the cultural landscape surrounding the internment camp. For these reasons, we strongly recommend that NPS (not BLM) prepare the environmental justice analysis for the EIS.
Coalition to Protect America's National Parks	SOC03 - 3 - Environmental Justice	Moving forward with preparation of the DEIS, the BLM must acknowledge the Nikkeis status as a community with environmental justice concerns; and fully consider the disparate impacts the proposed action would have on the internment camp survivors and descendants. In addition, we strongly recommend that NPS (not BLM) prepare the environmental justice analysis for the EIS due to the NPSs special expertise regarding the history, injustice, and long lasting impacts of the Nikkei incarcerations.
Coalition to Protect America's National Parks	SOC03 - 3 - Environmental Justice	In essence, Minidoka NHS serves not only as a tangible reminder of a dark chapter in our nation's history; it also serves as a public tribute to the Nikkei community's survival, resilience, and accomplishments. The evidence is compelling that the Japanese Americans, who survived incarceration at the ten War Relocation Authority internment camps, and their descendants constitute a distinct community with environmental justice concerns related to the Lava Ridge Wind Project.
Individual	SOC04 - 4 - Employment	This will be a great project to push forward! I am a College of Southern Idaho Renewable Energy student. This would be beneficial to me because it'll open up new avenues of work. It will also be beneficial for our environment!
Individual	SOC04 - 4 - Employment	This has struck my interest in many different ways. One being its beneficial knowledge and can benefit our environment. I am currently taking the renewable energy program at csi. The class that is provided for me will help me with skills and other important items to help me land a good job. Solar and wind are beneficial in there own ways but I plan to learn and use the skills required in the field.
Individual	SOC04 - 4 - Employment	This project would be a great idea to start if you haven't started all ready. I'm also in the Renewable Energy Technology and that benefit our class and get us jobs later in the future. I can't wait for you guys to get this project done.
Star Lake Grazing Permittees Sid Butte Livestock Association	SOC04 - 4 - Employment	Related thereto, the Permittees and their employees represent local people, who live and work in the local communities. The intended Project would appear to employ people that would not be from the local communities due to the seemingly specialized skills that would be involved during the (short-term) construction phase and during (long-term) operational / maintenance phase. In addition, it would seem that these specialized skill people would not live in Jerome or Lincoln Counties, but in Twin Falls County. Assuming this is the reality, the Permittees question the benefit to the local communities by the intended Project at least the employee matter.
Individual	SOC04 - 4 - Employment	With me being in the wind energy industry. This would benefit my local community to me personally and the world. With the industry getting larger and more employees being in demand this project would provide many needed jobs for our economy.
Individual	SOC04 - 4 - Employment	I believe that the Lava Ridge Wind Project will provide jobs and bring more people in these rural towns in order to help them grow. It will also be a good factor in the community. Not to mention the positive effects they will have on our ecosystem.
Individual	SOC04 - 4 - Employment	As a student at the college of southern Idaho within the renewable energy program, this project would benefit the program and the community. By enabling this project we are providing a future for renewable energy that will benefit us all by generating sustainable clean energy, and giving an opportunity to students and future workers like me to thrive in a newly explored field. By pushing renewables we can create a cleaner and safer environment that can last for us all to enjoy for generations to come. Wind energy is a step in the right direction for the community as a whole that will benefit society and further our prospects to allow clean energy to all residents.
Individual	SOC04 - 4 - Employment	This wind farm can be a staple in the renewable energy sector of Idaho. It can help make the snake river basin and magic valley an awesome addition to the regions that can provide renewable energy. I want to work at this site eventually and want to stay local. I've loved living hear and to have this site be present would allow me to stay a Idaho born individual rather than likely moving elsewhere.
Individual	SOC04 - 4 - Employment	I am in the renewable energy program offered at CSI and I believe that this wind project is going to be very beneficial, not only as a source of power, but as a flow of economy. It is the future and this project can make a tremendous difference to the amount of clean power we can use. I will be graduating in 2023 and I will want to be working close to home so if I could actually work on this site it would be amazing.
Individual	SOC04 - 4 - Employment	I believe this would be a great benefit, not only to renewable energy as a whole with the large amount of energy it could create and cleanly, but also to the surrounding communities/towns. The sheer number of turbines would provide many job opportunities, both in construction and maintenance/repair. I personally am in the CSI Renewable Energy Program and these turbines would provide me and my fellow classmates jobs straight out of college.
Individual	SOC04 - 4 - Employment	2) There are currently not enough people to fill the job vacancies that we have. So to say "we will bring jobs to the area" is not necessarily a good thing at this time.
Individual	SOC04 - 4 - Employment	- The local employment opportunity with this project is slim and limited.
Individual	SOC04 - 4 - Employment	The benefit of a few jobs is negligible compared to the harm of the environment, with the building of 380 miles of roadway, substations, and battery storage area, not to mention the simple beauty of the desert itself.
Individual	SOC05 - 5 - Housing	There proposal also say it will create 700 temporary construction Jobs. That is not good in a area were there is already a huge housing and labor shortage.
Individual	SOC04 - 4 - Employment	I'm excited to see further movement towards renewable energy specifically wind energy given how the drought has lowered the capacity of Idaho's hydro-regeneration. I'm more excited about the temporary and permanent jobs this project will bring in addition to the tax revenues. I'm currently going back to school while working nights at Glanbia so I can become a wind tech. I am resident of Gooding and look forward to the opportunity to work close to home.

Commenter	Comment Code	Comment Text
Individual	SOC05 - 5 - Housing	We strongly object for numerous reasons: 4.There is No housing to accommodate construction crews and/or eventual employees.
Individual	SOC05 - 5 - Housing	1) MVE is saying 400-850 temporary jobs during construction phase. The Magic Valley has no place to house anymore people. There are no houses for sale or rent and no vacancies in any Hotels or Motels. There are also no spaces in RV or trailer parks.
Individual	SOC05 - 5 - Housing	8)The Wind Farm will further raise the price of an over inflated housing market which will keep current residences from being able to purchase homes here
Individual	SOC06 - 6 - Taxes/Revenue	A wind farm in this area would be of great benefit to both the local economy and the energy production needs of the state. The tax revenue provided to each of the counties alone is of great help to making needed improvements to transportation infrastructure as well as any other projects that need to be completed. The project would also bring in more business to the local economy's due to workers purchasing goods. I believe that the overall good that could come from the project greatly outweighs the minor inconveniences that might be perceived by some of the public.
Individual	SOC06 - 6 - Taxes/Revenue	The small amount of tax revenue that will be created and split amongst the 3 counties once this is completed is not worth tearing up our beautiful and sacred Idaho land!
Individual	SOC06 - 6 - Taxes/Revenue	Financial promises are made to entice governmental organizations and garner support for such projects. They generally require tax payer subsidies and their economic cost is much greater than the economic value they produce. The benefits of such projects go to larger populated areas at the expense of a smaller population such as in the case of the Dietrich Community in Lincoln County. The Lava Ridge Project's approval would preclude the opportunity for solar farms or other developing technologies that would impact the area and communities less.
Individual	SOC06 - 6 - Taxes/Revenue	The citizens of Dietrich pay taxes to support and maintain those public properties, all while trying to survive financially on their own property. Additional taxes to the federal coffers from proposals like the Lava Ridge windmill project do not serve the interests of the area impacted by its construction and operation.
Hidden Valley Organic Dairy Farm	SOC06 - 6 - Taxes/Revenue	While the electricity that will be produced by the Lava Ridge Wind Project has not been contracted yet, there is not a large demand for energy anywhere in Idaho. In this state there is no rolling backouts or extreme power costs. The most likely outcome is that the power this project generates will go straight to Nevada or California, where there is ample room to build wind farms. However Magic Valley Energy has chosen our state due to lower property prices and taxes. Therefore, the supposed benefits for our community are virtually non-existent.
Individual	SOC06 - 6 - Taxes/Revenue	4. I feel both the federal government and the State of Idaho Government should be entitled to fees associated with a percentage of the generation of this power over the sites useful life.
Individual	SOC06 - 6 - Taxes/Revenue	The citizens of Idaho will not see a return on their investment. The power generated by the turbines will not benefit the citizens of Idaho. The generated power will be delivered to southern California and Idaho will not derive any energy benefit.
Individual	SOC06 - 6 - Taxes/Revenue	Although the company name, "Magic Valley Energy" would suggest this is an Idaho based company, in fact the company is based out of New York. The company will be profit driven with no regard to the impact the project will have on southern Idaho or the people who live here.
Individual	SOC06 - 6 - Taxes/Revenue	The full scope of project does not benefit the overall true aspect of being honest to Idaho/Residences. The environmental cost for Idaho Residence of only 3% for energy for Idaho usage is a no value and being able to control for Idaho needs. For all the overall damages to environment/roadway damages building/maintaining/disposal when they are depleted. How does that benefit Idaho's own required needs in the future for better land usage, with better and more reliable energy source's in near future. Should be First priority for Idaho Residence / Business lower cost needs First, then extra power energy be able to send to other needs after that time. Made/Owned by Idaho as to keep revenue/taxes in Idaho for Idaho
Individual	SOIL01 - 1 - General	Construction - the project will be built on shield volcanoes, lava tubes and cinder vents can be surprises.
Idaho Office of Energy and Mineral Resources	SOIL01 - 1 - General	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. - Collection System - Disturbance to surface soils and vegetation resulting from above ground and below ground electricity collection systems and communications cables
Western Watersheds Project	SOIL01 - 1 - General	Soil loss is of particular concern with this Project because of its soil type. In some portions of the site, pervasive pediciling around bluebunch bunchgrasses and other vegetation, indicates erosion and soil loss from cattle activity. Over time, trampling and concentrated hoof action have disturbed soils in some portions of the Project area and made them vulnerable to wind erosion. These areas still provide wildlife habitat, but the Projects construction activity will undoubtedly lead to further soil loss, due to the loamy soils. The inevitable disturbance and accompanying soil loss associated with the Projects construction activities will be additive to the historic and current soil loss directly attributable to livestock activity. If the massive footprint of the wind project is approved, it would be prudent to address and ameliorate as much of the root causes of future soil loss as possible because soil loss on the arid project site is an irretreivable resource in human time. Therefore, as a partial mitigation measure for the Project, we suggest reducing the other major factor contributing to soil loss. This can be done if there are willing sellers and a permanent grazing permit retirement process. Willing seller programs provide economic resources that can be immediately applied to local economies and help livestock producers and their families apply buyout funds to other local enterprises. In order to ensure soil protection and even soil development over geologic time, allotment buyouts and retirements need to be permanent. Appropriate language in the Lava Ridge EIS and Record of Decision would ensure the integrity and permanency of this multiple use application.
Individual	SOIL01 - 1 - General	Will there be any impact to lava tube caves?
Individual	SOIL01 - 1 - General	How will the top soil be stored for reclamation? Will it be stored in a manner that protects the quantity from theft? If this project has a long life cycle it is likely that a large percentage of topsoil needed for reclamation will disappear from wind and theft.
Individual	SOIL01 - 1 - General	I have great concern for blasting in areas known to have subterranean lava tubes. The geology should be explored carefully before commencing with blasting.
U.S. Environmental Protection Agency	SOIL01 - 1 - General	Fully disclose and analyze the projects potential impacts to soil resources, including: - How much soil will be disturbed and stockpiled under each alternative and how much soil will be needed for site reclamation; and - Discuss soil conservation and stabilization measures that will be required for the proposed project.
Idaho Conservation League	SOIL01 - 1 - General	We recommend that the BLM evaluate the existing road system and, where feasible, and close or decommission unneeded roads and corridors as part of mitigation efforts. Proper road maintenance is critical to controlling sedimentation.
Idaho Office of Energy and Mineral Resources	SSW01 - 1 - General/Other	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. - Species of Greatest Conservation Need (SGCN) - Potential Project effects on SGCN (e.g., pygmy rabbit, hoary bat, sage-thrasher, etc.) and their habitat.
Individual	SSW01 - 1 - General/Other	What species of concern have been identified within the project? How will these be addressed.
National Parks Conservation Association	SSW01 - 1 - General/Other	Impacts to national park wildlife and wildlife managed by and under the protection of Idaho Department of Fish and Game: We request a detailed analysis of key species, their ranges, their movement corridors, and the impact that construction and operation of the project (including sonic impacts) would introduce into the region. This should include analysis on pronghorn, mule deer, elk, Greater Sage-grouse, migratory birds, Golden Eagles, Ferruginous Hawks and any other raptors in the area. It should also include survey for bat species and local roosts, as bats are sensitive to the sonic impacts of wind energy.
National Parks Conservation Association	SSW01 - 1 - General/Other	Impacts to native plant communities and pollinators: We request that analysis be done in the region to identify sensitive and endemic species and range-restricted species.
Idaho Conservation League	SSW01 - 1 - General/Other	The expanded or accelerated use of some of these off site gravel and rock sources may lead to more rapid depletion of these sources, diminished supplies for other uses, and impacts to surface resources such as sage-grouse or Tiger beetles: There are two well developed commercial gravel pits that explore gravel to the surrounding counties for construction use. It is projected that the county has adequate resources for the foreseeable future. Other mineral resources in the county are extremely limited and primarily are lava rock used in home and garden construction. -Lincoln County Comprehensive Plan, p. 19.
Shoshone-Bannock Tribes	SSW01 - 1 - General/Other	Our initial assessment of the project proposal does indicate a potential for landscape level disturbances for a number of culturally important species and their habitat.

Commenter	Comment Code	Comment Text
Individual	SSW02 - 2 - Threatened and Endangered Species (ESA)	I understand that the Monarch Butterfly (Danaus plexippus) numbers have radically decreased and the likelihood of listing this species is high. What are the impacts of wind turbines on migrating insects? Would the listing of the Monarch Butterfly result in the decline of a BLM R-W permit.
U.S. Environmental Protection Agency	SSW02 - 2 - Threatened and Endangered Species (ESA)	As the proposed project may impact federally and state protected species and their habitats, EPA recommends that the NEPA analysis: - Identify the species in the project area and vicinity and their critical habitats; - Describe impacts the project will have on these resources
Individual	SSW02 - 2 - Threatened and Endangered Species (ESA)	Now, as today's energy challenges require us to extract energy from new resources, we must still be careful as to the impact we have on the environment. When your proposal is examined in a Environmental Impact analysis, I hope you will note these comments are concerned about the casualty rate the propeller blades will inflict on the Idaho blue birds and the yellow-billed cuckoo (already listed).
Idaho Conservation League	SSW03 - 3 - BLM Sensitive Species	The St. Anthony Dunes Tiger Beetle is only found in a few places in southern Idaho and Southwestern Montana. These endemic beetles require loose, sandy soils in which to build their distinctive burrows. The construction of roads and large infrastructure associated with wind turbines in this project proposal or additional sand removal activities to support the project could have a negative impact on St. Anthony Dunes Tiger Beetle numbers due to compaction of soil and destruction of burrows. The BLM and Magic Valley Energy/LS Power should get an accurate estimate of the population within the Lava Ridge project area, avoid high quality habitat, and mitigate any negative impacts to these endemic beetles.
Idaho Wildlife Federation	SSW04 - 4 - Greater Sage Grouse	As I understand, most, if not all, of the project falls under the General sage grouse Habitat Management Area framework- meaning the BLM would be required to provide a 0.25 buffer for roads, 0.6 mile buffer for infrastructure related to energy development, and a 0.12 mile buffer for fences around leks. Or is the BLM considering a larger buffer considering the project size? [attachments are screenshots from "Appendix B: Buffers" possibly excerpted from the sage grouse habitat management area framework referenced above]
Individual	SSW04 - 4 - Greater Sage Grouse	Sage Grouse are currently in trouble range wide and are declining in Idaho. The siting of this project is within known Sage Grouse habitat. Habitat loss and degradation are the primary cause of Sage Grouse decline. They will not tolerate vertical structures in their habitat. This wind project will contribute to the decline of this species and push Sage Grouse closer to an endangered species listing. Please build this project away from Sage Grouse habitat.
Individual	SSW04 - 4 - Greater Sage Grouse	Sage Grouse - there are very few left in our area.
Idaho Office of Energy and Mineral Resources	SSW04 - 4 - Greater Sage Grouse	The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project. - Greater Sage-grouse - Habitat degradation, fragmentation, and loss (e.g., sagebrush and wet meadows). - Disturbance and displacement. - Disruption of movement routes and habitat connectivity. - Mortality sources from Project infrastructure, predation risks, and vehicles. - Application of the mitigation hierarchy to first avoid and minimize adverse Project effects and then mitigate unavoidable residual adverse effects, noting that the States sage-grouse Habitat Quantification Tool (HQT) and Mitigation Principals document are available to aid the BLM and Proponent if compensatory mitigation is determined necessary through the NEPA analysis.
Western Watersheds Project	SSW04 - 4 - Greater Sage Grouse	We appreciate that as currently planned, the Project site appears to conform to the Idaho BLM sage-grouse plans prohibition against wind energy development in Priority Habitat Management Areas (PHMAs). In addition, the Projects June 2021 Plan of Development states that all wind turbines and associated infrastructure within a 3.1 mile buffer of active sage-grouse leks have been removed (Magic Valley Energy 2021 at C-3). However, the Project has been sited in sage-grouse General Habitat Management Area (GHMA), which means that it will negatively impact sage-grouse, which continue to decline in abundance in Idaho and the West.1 The Draft EIS should include alternatives proposing robust, specific sage-grouse mitigation to offset the effects of habitat fragmentation and loss, as well as to offset the impacts of introducing tall structures (wind turbines and power/transmission lines) into sage-grouse habitat. The effectiveness of any proposed mitigation for greater sage-grouse or other wildlife should also be addressed in the Draft EIS. To protect greater sage-grouse and birds protected by the Migratory Bird Treaty Act (MBTA), power lines should be undergrounded as much as possible. This will reduce the number of new hunting perches for raptor species that prey on sage-grouse. Undergrounding power lines will also reduce collision and electrocution risk for raptors and other birds protected by the MBTA.
Western Watersheds Project	SSW04 - 4 - Greater Sage Grouse	The Draft EIS should include detailed information about greater sage-grouse in the Project area, including the name of the Population Management Unit (PMU), lek trends in the area and for that PMU time, how sage-grouse use the area seasonally, maps of sage-grouse seasonal habitat use, and whether any hard or soft population or habitat triggers have been reached, as well as what is known about the causes of any triggers that have been reached and the adaptive management measures BLM has adopted to respond to them.
Individual	SSW04 - 4 - Greater Sage Grouse	We applaud the possibilities offered by the Lava Ridge Wind Project - EXCEPT - with the caveat that it will comply with the 2015 Idaho Sage Grouse "Approved Resource Management Plan Amendment" (ARMPA). Sage Grouse are listed as 'Threatened' under the Endangered Species Act, and actually listed as 'Endangered' by the IUCN Red List. The project should avoid disturbing "Important Habitat Management Area" (IHMA) and "General Habitat Management Area" (GHMA) as much as possible. So, no turbines, access roads, or power lines or other supporting infrastructure should be located in Sage Grouse 'Priority Habitat Management Areas' (PHMA). And NONE of these items should be located within four miles of Sage Grouse Leks. Where possible, power lines in Grouse habitat should be installed underground. (Some exceptions may be necessary where it is difficult to underground in lava rock.) According to the U.S. Fish and Wildlife Service (FWS) this region has Important Conservation Areas and is an Occupied Range for Greater Sage Grouse in Idaho. In thier website (www.fws.gov/greatersagegrouse/factsheets/IdahoGrSGFactSheet_FINAL%20(1).pdf) it is stated : "Located at the northern edge of the Great Basin, Idaho has a cluster of priority habitat areas in the central part of the state that functions as a hub for genetic connectivity between the eastern and western portion of the species range." Within BLM's own planning document called "A Framework to Identify Greater Sage-grouse Preliminary Priority Habitat and Preliminary General Habitat for Idaho" there is a map that shows this region to be a primary Sage Grouse Management Area and below is another one of the maps copied from the website of the primary Lek Locations, specifically in the region of the Lava Ridge project. Ref: eplanning.blm.gov/public_projects/lup/31652/58594/63657/V_-_ID_swMT_FEIS_-_GSG_Habitat_Delineations.pdf. Also, please pay attention to the fact that the "1918 Migratory Bird Treaty Act" must be adhered to. The U.S. Fish and Wildlife Service rule, under the Biden Administration, restores protections under this bedrock environmental law, which prohibits the take of migratory bird species (regulatory-speak for hunting, killing, capturing, selling or otherwise hurting them). Interior Secretary Deb Haaland said the restored interpretation of the rule would protect more birds threatened by the dual crises of climate change and habitat loss. We don't want the Lava Ridge project to promote habitat loss. BUT, having said all the above, we desperately need the power from Wind in this critical age when Climate Change is threatening our planet. So we ask that care be taken to respect the threats to Sage Grouse, while providing important power for our region at the same time.
American Bird Conservancy	SSW04 - 4 - Greater Sage Grouse	As indicated above, the majority of the proposed Lava Ridge Wind project site is in general habitat for Greater Sage-grouse. We are dismayed that this massive area of grouse habitat, on public land, is being proposed for development. Given grouse population declines, ongoing range contraction, and prediction for long-term eradication from much of this species range, eliminating such a large block of habitat should not be an option. The sheer scale of the amount of grouse habitat that would be lost if the Lava Ridge Wind project is constructed as proposed demands that risk to this imperiled species be thoroughly evaluated and addressed. The Plan of Development (POD) for the proposed project indicates that the following will be conducted for Greater Sage-grouse: (1) Desktop-level impact assessment, (2) Ground checks of active and pending leks within the proposed project area, and (3) Aerial reconnaissance for leks within or in proximity to the proposed project site. This suite of surveys focuses only on leks, and thus neglects Greater Sage-grouse habitat use during the majority of the year. This is clearly inadequate. Recommendations 1.Significantly reduce or eliminate the inclusion of general grouse habitat in the plan, prioritizing preservation of the best habitat, known occupied areas, and areas contiguous with habitat off-site. 2.If Greater Sage-grouse leks are discovered in the proposed project site, turbines and other infrastructure within 5 miles7 should be removed from the plan or relocated to avoid impacts. 3.Aerial surveys or another scientifically-justified methodology should be conducted to identify Greater Sage-grouse wintering areas. Surveys should be conducted over multiple years.

Commenter	Comment Code	Comment Text
		<p>4.If Greater Sage-grouse wintering grounds are discovered in the proposed project site, turbines and other infrastructure should be relocated or removed from the plan in these areas and within an associated science-based buffer.</p> <p>5.Following revisions to the plan based on the points above, incorporate further revisions to allow for habitat, population, and genetic connectivity among preserved habitat areas and offsite habitat.</p> <p>6.Compensatory mitigation should be provided to a net conservation benefit for impacts to Greater Sage-grouse through on-the-ground conservation actions to offset losses. This should prioritize permanent protection of priority habitat to realize the greatest positive impact.</p>
The Nature Conservancy	SSW04 - 4 - Greater Sage Grouse	Greater sage-grouse. With the continuing downward trend in sage grouse abundance in Idaho (Coates et al. 2021a), it is important to conduct a thorough analysis of the potential impacts of the Lava Ridge Project on current and future sage grouse populations. Much of the proposed project area overlaps area classified in State and Federal plans as "General Habitat" (e.g., BLM, Idaho State Office 2019b).
Idaho Conservation League	SSW04 - 4 - Greater Sage Grouse	<p>Fragmentation of sage-grouse habitat from infrastructure such as wind projects is a major threat to sage-grouse conservation, superseded only by wildfires and invasive annual grasses. Priority Habitat Management Areas for sage-grouse are exclusion areas for wind development. Important Habitat Management Areas may be available for wind development with special stipulations, unless there has been a significant drop in sage-grouse numbers or decrease in functional habitat, in which case these also become exclusion areas. General Habitat Management Areas are also avoidance areas but may be available for wind development with special stipulations.</p> <p>We appreciate the fact that the project area was selected in part because it is classified outside of Priority or Important Habitat Management Areas. It is located partially within a General Sage-grouse Habitat Management Area and there are at least three sage-grouse leks within the larger project area. We support the application of a 3.1 mile buffer between the leks and associated infrastructure such as turbines, roads and transmission lines.</p> <p>We feel this level of caution is warranted. Road construction and use associated with transmission line maintenance represent high risk for loss of lek areas, nesting locations, and brood-rearing habitats (Braun 1986, Connelly et al. 2004). In addition, sage-grouse have been shown to avoid transmission lines, presumably because of potential predation. Ellis (1985) found a 72% decline in the average of males on leks and a 65% increase in predation efforts involving raptors following the construction of a transmission line within 200 m of an active sage-grouse lek in northeastern Utah. Sage-grouse lek attendance dropped significantly following power line construction within 3 miles of leks in California. In a comprehensive study of ecological requirements, sage-grouse were extirpated in areas where power line densities were above 0.20 km/km2 and sage-grouse habitat was ranked highest where power lines were less than 0.06 km/km2.</p>
Idaho Conservation League	SSW04 - 4 - Greater Sage Grouse	<p>Regarding the spatial scale of proposed management activity effects on sage-grouse and habitat, the BLM should recognize that sage-grouse can require movements of tens of miles between required habitats. Thus, a significant challenge in managing and conserving sage-grouse populations is the fact that they depend upon different types of habitat for each stage of their annual cycle (Connelly et al. 2009), and upon the ability to move between the different habitats throughout the year. Each seasonal habitat must provide the necessary protection from predators, required food resources, and thermal needs for the specific stage of the annual cycle. Breeding-related events and season habitat needs are described below:</p> <p>1) Late brood-rearing period in July through September. Late brood-rearing is focused in wetter areas, especially riparian and spring-associated meadows closely associated with nearby sagebrush.</p> <p>2) Movement to winter habitat.</p> <p>3) Occupation of winter habitat from November through February. The primary requirement of winter habitat is sagebrush exposure above the snow, and is generally characterized by dense sagebrush, often including areas of wind-swept ridges.</p> <p>4) Lekking, which may begin as early as late February, and may extend into May. Lekking requires open expanses of sagebrush within a large area of sagebrush cover. Lek persistence has been affected by disturbance activities within 3.1, 11.2, and 33.5 mile radii (Swenson et al. 1987, Johnson et al. 2009, Knick and Hanser 2009).</p> <p>5) Female movement to nesting sites and nesting between March and June. Nesting females commonly move 3-5 miles or farther from the lekking site. Females select areas with more sagebrush canopy than is generally available in the surrounding landscape (Holloran et al 2005, Hagen et al. 2007)</p> <p>6) Hatching and early brood-rearing in May and June. Females continue to use relatively dense stands of sagebrush for earliest brood-rearing habitat if native forbs and insects are available. When vegetation desiccates, females and broods move to wetter areas in search of the native forbs and insects required by chicks.</p> <p>Given the considerations of year-round habitat use and known impacts of human activity on sage-grouse populations, particular care needs to be taken to avoid disturbance near lekking areas, disturbance and loss of sagebrush and native forbs used for early brood-rearing, and disturbance and impacts to hydrologic function of wet areas used for early to late brood-rearing.</p>
Idaho Conservation League	SSW04 - 4 - Greater Sage Grouse	<p>Avoiding human footprint at a 3.1 mile radius from leks is an important first step in protecting sage-grouse populations, but sage-grouse could be engaged in nesting and brood-rearing, in addition to lekking, for much of the planned construction activity period. Recent studies have shown that only 64% of nesting sites occur within 3.1 miles of leks, but 80% of nests are found within five miles, and 20% of nests occur at distances greater than five miles from leks. Nest success is also greater the farther a nest occurs from a lek, indicating a disproportionate potential importance of these more important nests for population recruitment.</p> <p>Based on the habitat guidelines for sage-grouse management presented in Connelly et al. (2000), and others, we recommend siting infrastructure far enough from leks and other sage-grouse habitat to avoid negative effects. Aldridge and Boyce (2007) and Doherty et al. (2010) identify a buffer of 6.2 miles to protect important nesting and brood-rearing habitats. Depending on how sage-grouse are utilizing the project area, the BLM should consider placing a similar sized buffer around the largest of the three sage-grouse leks in one of the alternatives.</p> <p>The BLM and Magic Valley Energy/LS Power should also consider how construction and operations may be affected should the USFWS decide to protect Sage-grouse under the Endangered Species Act during the life of this project. A more protective buffer at the start of the project may allow the project to proceed with more certainty rather than have construction or operations curtailed at some later date due to a listing decision and insufficient buffers within the project area.</p>
Idaho Conservation League	SSW04 - 4 - Greater Sage Grouse	<p>After avoidance, the next step is for the BLM to develop design features to ensure that any side effects or minor impacts are minimized. With regard to activities with the potential to disturb sage-grouse, the Conservation Plan offers this recommendation:</p> <p>Apply seasonal-use restrictions (see Human Disturbance Section 4.3.5) on activities associated with the exploration, operations, and maintenance of mines, gravel pits, or landfills, including those associated with supporting infrastructure.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>Mitigation</p> <p>If the BLM and Magic Valley Energy/LS Power successfully avoid and minimize impacts to sage-grouse there will still be an array of indirect effects to sage-grouse. The USFWS determined that transmission lines and energy infrastructure may cause a host of adverse indirect effects to sage-grouse, including increased predation, lower recruitment rates, habitat fragmentation, habitat degradation from invasive species, and impacts from electromagnetic fields.</p> <p>FLMPA requires the BLM to, take any action necessary to prevent unnecessary or undue degradation of the lands, (43 U.S.C. 1732 (b)) (emphasis added). This directive clearly provides the BLM with the authority to require operators or individuals proposing to impact Sage-grouse Priority, Important Habitat or General Habitat Management Areas to participate in a Compensatory Mitigation program that restores or enhances degraded habitat in off-site locations within the affected resource planning area.</p> <p>As such, the next step is to develop off-site mitigation for any remaining impacts:</p> <p>Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>A key component of the Governors Sage-Grouse Conservation Plan is the use of a Mitigation Framework developed by the State Sage-Grouse Advisory Committee and references in the 2015 Greater Sage-grouse Amended Resource Management Plans for Idaho and Southwest Montana. The mitigation framework requires the quantification of both direct and indirect impacts. A Habitat Equivalency Analysis tool can be helpful in determining the quality of the habitat adjacent to the project, the topography of that habitat, the impacts to that habitat and to sage-grouse, and the specific use of that habitat by sage-grouse (lekking, nesting and brood rearing, etc).</p> <p>Depending on the nature and degree of these impacts, mitigation measures may be more successful in off-site high-priority restoration areas with a higher likelihood of full benefits to sage-grouse. The States Mitigation Technical Team can assist with locating suitable sites and types of projects. Mitigation projects need to persist for the duration of the impacts, take into account any lag time between the beginning of impacts and the accrual of benefits, factor in the success rate of vegetation restoration efforts, likelihood of habitat restoration failures or loss due to drought, and rate of habitat loss due to wildfires.</p>
Idaho Conservation League	SSW04 - 4 - Greater Sage Grouse	<p>We appreciate the fact that the project area was selected in part because it is classified outside of Priority or Important Habitat Management Areas. It is located partially within a General Sage-grouse Habitat Management Area and there are at least three sage-grouse leks within the larger project area. We support the application of a 3.1 mile buffer between the leks and associated infrastructure such as turbines, roads and transmission lines.</p> <p>We feel this level of caution is warranted. Road construction and use associated with transmission line maintenance represent high risk for loss of lek areas, nesting locations, and brood-rearing habitats (Braun 1986, Connelly et al. 2004). , In addition, sage-grouse have been shown to avoid transmission lines, presumably because of potential predation. Ellis (1985) found a 72% decline in the average of males on leks and a 65% increase in predation efforts involving raptors following the construction of a transmission line within 200 m of an active sage-grouse lek in northeastern Utah. Sage-grouse lek attendance dropped significantly following power line construction within 3 miles of leks in California. In a comprehensive study of ecological requirements, sage-grouse were extirpated in areas where power line densities were above 0.20 km/km2 and sage-grouse habitat was ranked highest where power lines were less than 0.06 km/km2.</p>

Commenter	Comment Code	Comment Text
Individual	SSW04 - 4 - Greater Sage Grouse	The area proposed for this wind farm is historic sage grouse land. The sage grouse will not frequent areas where there are tall structures due to predator danger. Given the restrictions already placed on other public lands in the West concerning sage grouse, this project should not be considered in this area.
Theodore Roosevelt Conservation Partnership	SSW04 - 4 - Greater Sage Grouse	<p>II. The EIS must analyze cumulative impacts to sage grouse and develop alternatives that minimize or avoid activities that would threaten populations on a short-, mid-, and long-term timescale.</p> <p>Sage grouse are a bell weather of the health of sagebrush ecosystems, as well as an umbrella species for the protection of other sagebrush-obligate or semi-obligate species given their near complete dependence on sagebrush ecosystems throughout their life history. Sage grouse populations have declined 80 percent since 1965. If current conditions persist, leading biologists predict only a 50 percent chance that most leks will be considered productive in 60 years. Sagebrush habitat has also been wiped away by as much as 20 percent in 20 years due to widespread fire, invasive grasses, and disturbances from energy development. The BLM should also make sure to comply with exclusion, avoidance, and other relevant management actions to conserve greater sage-grouse included in the 2015 Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region.</p>
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	SSW04 - 4 - Greater Sage Grouse	<p>II. The EIS must analyze cumulative impacts to Greater Sage-grouse and develop alternatives that minimize or avoid activities that would threaten populations on a short, mid, and long term timescale.</p> <p>Greater Sage-grouse are considered an indicator of the integrity of sagebrush ecosystems, as well as an umbrella species for the protection of other sagebrush-obligate or semi-obligate species given their near complete dependence on sagebrush ecosystems throughout their life history¹⁸. Sage-grouse have been identified as a species of conservation concern by the Western Association of Fish and Wildlife Agencies in 1953, and have risen to priority level for many state and federal agencies, mostly over concerns that the species might be listed for federal protection under the Endangered Species Act.</p> <p>In March 2021, U.S. Geological Survey (USGS) researchers released a scientific report that provides one of the most comprehensive population trend modeling efforts ever undertaken for the species¹⁹. The report describes an overall decline in the number of sage-grouse across the majority of their range, something previous studies have shown as well. Since 1965, sage-grouse populations have declined 80.7% range-wide (~3% decline per year), including areas where the decline has not been as severe. Since 2002, range-wide populations have declined 37%. Furthermore, 78% of leks have a greater than 50% probability of extirpation in the next 56 years.</p> <p>Idaho is no exception in exhibiting declining grouse populations. The state continues to have declining trajectory from peak counts in 2016, with 2019 appearing to be a nadir and stronger declines occurring north of the Snake River²⁰.</p> <p>Figure 1. The average number of male Greater Sage-grouse counted on Idaho breekd-ground leks, reported on an annual basis 1996-2021. (Idaho Department of Fish and Game)</p> <p>Range-wide sage-grouse population declines should be taken in consideration with the Western Association of Fish and Wildlife Agencies-led Sagebrush Conservation Strategy Challenges to Sagebrush Conservation. This document provides a thorough and credible overview and assessment of the challenges facing land managers and landowners in conserving sagebrush ecosystems²¹. Thus extra caution should be taken in the management of their sagebrush habitat, as habitat quality and quantity directly influence grouse populations.</p> <p>The collective influence of human activity on the landscape has been associated with negative trends in sage-grouse lek counts and population persistence²². Research has been conducted on impacts to sage-grouse from oil and gas development, but less information is available about the effects of renewable energy development on sage-grouse. Infrastructure associated with energy development requires direct removal of vegetation and could result in direct impacts associated with vehicle traffic, human activity, and noise pollution that would continue for the life of the project²³.</p> <p>Buffers between project developments and sage-grouse leks and key habitats are the best way to prevent impacts from occurring, and are well supported by peer-reviewed science. The relative probability of Greater Sage-grouse selecting brood-rearing and summer habitats decreased as percentage of surface disturbance associated with wind facility infrastructure increased²⁴. Furthermore, researchers found that sage-grouse nest and brood failures increased with proximity to wind-energy infrastructure specifically a linear decline of 7.1% in nest failure and 38% in brood failure with each 1-km (0.6-mi) increase in distance from wind energy infrastructure²⁵.</p> <p>Studies suggest that an 8-km (5-mi) protection area centered on an active lek location should encompass the seasonal movements and habitat use of 90-95 percent of sage-grouse associated with the lek 26. Sage-grouse female survival did not vary in relation to wind-energy infrastructure though lek counts were not affected until 3-years post-development²⁷. At that point, counts decreased by 56% at leks near (<1.5 km; 0.9 mi) the wind farm compared to those farther away (>1.5 km; 0.9 mi)²⁸. Such lag effects have also been observed in response to oil and gas development, where declines were not observed until 4 years after construction²⁹.</p> <p>Figure 2. Greater Sage-grouse leks and habitat designations, predicted Golden Eagle nest densities, and land ownership in relation to proposed Lava Ridge wind project area.</p> <p>Closer examination of Appendix 4 of the USGS report suggests there are a handful of leks within 10 miles of the proposed project area, including several within the boundary³⁰. Based on this report, Figure 2 was created to illustrate the approximate lek locations in relation to the project boundary. This figure also reflects designated grouse habitat types on public lands in the general area. Finally, of relevance to later discussion, it shows predicted high and very high Golden Eagle nest densities³¹ and Audubon's designated Important Bird Areas³².</p>
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	SSW04 - 4 - Greater Sage Grouse	Reversing the decline in sage-grouse populations that has occurred over the past 50 years will require significant investments in core/priority habitats as well as general habitat to avoid a patchwork of habitat effectiveness. Our organizations appreciate the level of concern that Magic Valley Energy (MVE) has displayed in public meetings on the project location as it relates to sage-grouse. The proposed project location was selected, in part, due to the absence of land use constraints such as wildlife management areas, areas of critical environmental concern (ACEC)roadless areas, and other restrictive land use designations. While we appreciate both MVE and the BLMs efforts to minimize impacts to sensitive wildlife species, our organizations have initial concerns that this rationale for project location only focuses on the immediate and short-term conditions. Making decisions based only on current conditions may preclude future restoration or conservation actions within the proposed project location that may be necessary to prevent sage-grouse population declines and from once again being a candidate for listing under the Endangered Species Act (ESA). We encourage the BLM to analyze short, mid, and long-term impacts to sage-grouse within the Idaho Desert Conservation Area as a whole; the proposed project area may become increasingly important for the species persistence as the sagebrush ecosystem continues to be compromised in quantity and quality across the West.
Individual	SSW05 - 5 - Eagles	Both Bald and Golden Eagles occur in this area as well as many other species of raptors. These large wind turbines are deadly to all raptors, other birds, and bats. Placing this project in this area is short sighted and will do significant environmental harm.
Individual	SSW05 - 5 - Eagles	pinning blades seem like a threat to our hawks and golden eagles, they eat up a lot of mice and voles.
Western Watersheds Project	SSW05 - 5 - Eagles	<p>To protect eagle reproduction, blasting should not take place within two miles of eagle nests during breeding season. In California and Nevada, the U.S. Fish and Wildlife Service (FWS) recommends a two-mile buffer for blasting during golden eagle breeding season (FWS 2020). FWS recently required that two-mile buffer in a golden eagle incidental take permit for the Hycroft Mine in Nevada (FWS 2019 at unnumbered page 4). There is no scientific reason why eagles in Idaho should not receive similar protection.</p> <p>To protect eagles and other wildlife that consume carrion, it is very important that low speed limits within the Project boundaries are established and enforced, and that roadkill and livestock carcasses are quickly removed.</p>
Individual	SUP01 - 1 - General	I'm glad to see this in motion because I believe in a green future. I attend college of southern Idaho where I'm in renewable energy so I'm glad to see this happening!
Individual	SUP01 - 1 - General	Super supportive of this project!
Individual	SUP01 - 1 - General	<p>As an Earthling along with all other creatures, great and small, I wholly approve and encourage energy sources that do not aid in the destruction of nature - upon which all life depends.</p> <p>I trust these projects will be approved and implemented post haste, given the ghastly conditions our assault on the planet (of the recent 100 yrs) has produced. Our children's children are inheriting a perfect storm of crises. PLEASE move forward with all projects that end our use of fossil fuels, or at the very least, reduce it substantially.</p>
Individual	SUP01 - 1 - General	I approve of the wind project North East of Twin Falls. We have had a summer full of drought, fires, smoke and excess heat. This project creates jobs, is clean energy, and moves us into the future where we need to help our beautiful state stay that way.
Individual	SUP01 - 1 - General	As a current student learning about renewable energy at CSI, I am all for this project to take place. After learning the benefits wind turbines can produce this is a necessity we need going into the future for cleaner energy. Especially now as growing up I have seen how nonrenewable energy is taking on toll on the environment and our pockets for gas. I also feels this can help shape how the world views renewable energy in general after seeing a more largescale farm.
Individual	SUP01 - 1 - General	I definitely approve of this additional wind generation. We should be doing all we can to reduce our reliance on carbon-intensive energy, especially as the population of Idaho continues to grow. The more energy (Such as solar, wind, nuclear, and more) we can generate the better.
Individual	SUP01 - 1 - General	<p>I am a strong proponent of the lava ridge wind project being built in our area.</p> <p>After reading and listening, I see many many advantages to the local communities, the state of Idaho, and the west in general.</p>
Individual	SUP01 - 1 - General	Also, while it may not be helpful in this stage of planning, I am firmly in support of this project.

Commenter	Comment Code	Comment Text
Individual	SUP01 - 1 - General	I think that the information in the report is well put and relatively intuitive. There is a great amount of information organized in a succinct and comprehensive manner that can be easily accessed by the reader to answer the majority of questions about the overall project. The change from the open house to now is staggering. Being able to see the difference, it is impressive the modifications that have been made in response to the concerns of the public. I appreciate the transparency during the progression of this project and offer my full support in the further developments being made to produce alternative energy in both our local area and in the world moving forward.
Individual	SUP01 - 1 - General	I would love to see this happen!!! A great resource and a great place to do it!!
Individual	SUP01 - 1 - General	I am all for the wind project. There is a lot of miss information being spread about wind power that is simply not true. There is never a time at 200 feet in the air that when doesn't blow. Perhaps letting people know how much power they produce and that they are always on during peak hours would be critical in getting it done. Solar power only produces electricity for a certain time of day, and is super expensive. Hydroelectric power cant expand anymore too.
Individual	SUP01 - 1 - General	I am definitely in favor of the Lava Ridge project. We need more sustainable energy and less fossil fuel usage. With all the lava in that area it seems to be a very sensible use of that land. The tremendous population growth in Idaho will not be slowing down anytime soon so we need the added power this project will supply.
Individual	SUP01 - 1 - General	I am very much in favor of the construction of the Lava Ridge project in southern Idaho. It is the perfect project for that location
Project Mutual Telephone	SUP01 - 1 - General	PMT recognizes the need for alternate energy sources and applauds the opportunity of utilizing wind power in the Southern Idaho Region.
Individual	SUP01 - 1 - General	I am pro in support of this!
Individual	SUP01 - 1 - General	I would like to make the comment that this Lava Ridge Wind project would be a great addition to the local area and economy. The project will bring jobs and growth and opportunity for locals and the much needed economic development to the area. I fully support this project understanding that they follow all the laws and policies of protecting the local environment and the local wildlife. When everyone works together for the greater good projects like these are what makes an economy thrive and gives people opportunities.
Individual	SUP01 - 1 - General	having the wind turbines be place on lava rock helps in reducing the chance of harming the environment and it will prove a good source of energy for local communities.
Individual	SUP01 - 1 - General	I don't think you will find to many areas in the lower 48 that be better choices for renewable energy production.
Individual	SUP01 - 1 - General	I would like to see this project go forward.
Individual	TRAN01 - 1 - General	The 1,000s of loads of concrete, builders and contractors that would hammer the desert roads, and the county roads that are already working to keep up with trucks from beet, grain, potato factories and daily use.
Individual	TRAN01 - 1 - General	16. Who maintains the roads? 17. Are the roads open to the public?
Magic Valley ATV Riders	TRAN01 - 1 - General	To restrict and eliminate our right to recreate on public lands is a disservice to the recreation community and citizens of Idaho. Current road and trail conditions allows users to spread out, reducing the impact on roads and trials. Any loss of roads and trails will result in increased use on a smaller number of roads and trails that the Bureau of Land Management currently does not maintain.
Idaho Transportation Department	TRAN01 - 1 - General	It appears the extent of traffic volume of SH-24 in Lincoln County is predicated on the ability to off-load the wind turbine components from Union Pacific spur lines near Owinza Crossing. US-93 may be used from the 1-84/US-93 interchange north to 200N in Jerome County. SH-25 may be used from Junctions at US-93 or SH-SO depending on the exit points from 1-84. SH-50 could be used from the Eden Exit to the Junction of SH-25, depending on the turning radii of the construction and delivery vehicles.
Individual	TRAN01 - 1 - General	Some of the concerns I hope will be discussed are the many miles of additional roads that will be built in the desert. This will create more dust and traffic which will eliminate the plant growth where the roadways will be built. Additionally, this will limit the amount of feed and forage for livestock and wildlife and bring more people, both curious and as part of the project.
Idaho Conservation League	TRAN01 - 1 - General	The DEIS should include a detailed transportation plan, particularly for the transport of turbine components, main assembly cranes, and other large pieces of equipment. The plan should consider specific object sizes, weights, origin, destination, and unique handling requirements and evaluate alternative transportation approaches. In addition, the process to be used to ensure compliance with state requirements and to obtain all necessary permits should be clearly identified.
Idaho Conservation League	TRAN01 - 1 - General	We encourage examining the Union Pacific Rail to transport equipment to the site as one potential alternative. The BLM should also address where construction these materials come from (Boise, Twin Falls, Salt Lake City) and which local routes will be used. Transportation and construction activities should be timed to minimize impacts to local traffic and to regular events such as the first day of hunting season.
Individual	TRAN02 - 2 - Traffic Volume/Congestion	5.Our quality of life will diminish from increased traffic of construction crews, equipment, supplies and massive equipment--as well as the eventual employees.
Star Lake Grazing Permittees Sid Butte Livestock Association	TRAN03 - 3 - Road Maintenance	3 Beyond the intended access roads within the Star Lake Allotment, BLM would need to assess the adverse impact upon other local, county, State roads and infrastructure. Hubert Shaw reports that in talking to local highway commissioners, such commissioners have concerns about damage to local roads and bridges from oversized loads.
Dietrich School District #134	TRAN03 - 3 - Road Maintenance	We have been advised regarding the impact of the project upon out bus routes, busses and student transportation. Increased traffic and road damage from construction equipment and personnel will ultimately require route changes, detours and cancellations with a daily analysis by parents and school district officials on student safety and transportation for regular school attendance and after hour activities. As routes required to service our students are on unpaved gravel base roads in the project area, it will ultimately increase the cost of our transportation with bus repairs and maintenance costs.
Individual	TRAN03 - 3 - Road Maintenance	Roads / Access - who will build? Who will maintain? Are the roads constructed on BLM land public access limited access or no access? Do they become a liability for the highway district? i.e., gravel / snow removal.
Idaho Transportation Department	TRAN03 - 3 - Road Maintenance	The district is concerned about the impact of the construction equipment on the highway routes of the state system and the Local Road Inventory (LRI). The map shown on the Lava Ridge Wind Project Scoping Information indicates State Routes 24, 25 & 50 (AKA "SH-24, SH-25 and SH-50", respectively), Interstate 1-84, and US-93 to be used as access roads. ITD is directly responsible for the construction and maintenance of these routes.
Idaho Transportation Department	TRAN03 - 3 - Road Maintenance	A significant unforecasted increase in commercial traffic is likely to accelerate pavement distress and reduce pavement life. For example, a significant increase in heavy commercial traffic on a county farm-to-market highway will exhibit distress much faster than pavement on the interstate. The interstate pavement is designed for a very high number of heavy vehicles; while the local county roads are designed for a very low number of farm to market vehicles. To head off acceleration of pavement distress and reduced pavement life it is necessary to apply preventive maintenance measures such as bituminous plant mix overlays or replacement of plant mix surfaces. Allowing pavements to fail in distress results in costly rehabilitation or reconstruction. The costs of these treatments are usually borne by the local highway districts or state. Performing preventative maintenance is a far more efficient use of public funds than reconstruction. ITD programs preventative maintenance projects on pavements for this reason.
Idaho Transportation Department	TRAN03 - 3 - Road Maintenance	The District recommends that the routes used to deliver and construct the wind turbines be identified, and a plausible prediction of heavy construction and delivery vehicles be provided. Once these routes and predicted, analysis should be accomplished to predict distress on the State, Federal, and LRI routes. If deemed necessary, preventative maintenance measures should be accomplished on routes indicating significant premature failure. It is the opinion of ITD that distress on the access roads be predicted based on the anticipated heavy traffic for this project. Preventative maintenance measures should be completed before commencement of this project. Preventative measures should include but not be limited to bituminous concrete overlays, replacement of bituminous concrete surfacing, placement of new Bituminous concrete, or added gravel to non-paved LRI routes. A qualified pavement engineer licensed in the state of Idaho should accomplish the analysis of distress and treatment recommendations. These measures will significantly lower the probability of premature failure to the public roadways due to the construction of this project.
Individual	TRAN03 - 3 - Road Maintenance	Who maintains the 380 miles of roads and are they open to the public?
Western Watersheds Project	VEG01 - 1 - General	In addition, during reclamation of infrastructure projects, even properly planned and executed seeding efforts can and do fail. Therefore, seeding activities must be accompanied by a two-growing-season rest period from livestock grazing to enable the best chance for re-vegetation establishment and survival. The long-term planning process associated with a project as large as this one will allow for seed collection from the same ecological sites and for growth of sagebrush seedlings. Successful sagebrush seedings are notoriously difficult. However, containerized seedlings have a much higher establishment rate. Planting containerized seedlings requires an organizational infrastructure of seed collection, germination, growth and planting. BLMs Seeds of Success program has been working with institutional partners in the Great Basin. Those efforts could perhaps be expanded to incorporate reclamation of this Project, both interim and long term. Areas of the Project site that are designated habitat management areas for greater sage-grouse should be re-seeded with native species chosen to support greater sage-grouse.
Prescott Land and Livestock	VEG01 - 1 - General	7) Construction activities will cause an increase in noxious weed and downy brome (cheatgrass) invasion. Currently, large populations of rush skeletonweed, scotch thistle, Canada thistle, musk thistle and knapweed spp. are observed. These populations will increase substantially with increased traffic and environmental disturbances. Further, annual weedy species will increase as a direct result of this project, further reducing overall forage production. Annual species include mustard spp., prickly lettuce, kochia, downy

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		brome, bur buttercup, and others. Annual weedy species, particularly downy brome, are also known to increase range fire size and frequency.7a) An aggressive weed management plan must be developed and implemented to mitigate the forage losses caused from an increase in noxious and annual weedy spp. This is critical to preserve the overall ecosystem health of Star Lake. As part of this plan, rehabilitation must be included to mitigate significant disturbances and increased weedy spp. seed bank.
Prescott Land and Livestock	VEG01 - 1 - General	Reseeding of rangeland is generally only permissible after a fire or if a recent seeding did not establish adequate, viable seedlings. The wind project should warrant reseeding of significantly disturbed areas. Reseeding must be accomplished with certified, weed free, indigenous plant species. Reseeding involves direct seeding" depth directly into affected areas in the late fall to take advantage of fall and winter moisture. Reseeded areas are typically deferred by temporary fencing no less than two grazing seasons as established by federal regulations. Reseeding will be more effective if downy brome is controlled correctly. Reseedings should be based on BLM records of native grasses, perennial and annual forbes.
Prescott Land and Livestock	VEG01 - 1 - General	Construction activities will cause an increase in noxious weed and downy brome (cheatgrass) invasion. Currently, large populations of rush skeltonweed, scotch thistle, and knapweed spp. are observed. These populations will increase substantially with increased traffic and environmental disturbances. It will be critical to have a functioning invasive species management and rehabilitation plan in place. Annual weedy species will increase as a direct result of this project, further reducing overall forage production. Annual species include mustard spp., prickly lettuce, kochia, downy brome, bur buttercup, and others. Annual weedy species are also known to increase range fire size and frequency.
National Parks Conservation Association	VEG01 - 1 - General	Invasive Species: Invasive species tend to follow roads and construction into landscapes. Specific species of concern for this project is cheatgrass (Bromus tectorum). How will the construction and disturbance of this landscape affect the natural vegetative regimes in this region and what specific measures will be taken to abate invasive species?
U.S. Environmental Protection Agency	VEG01 - 1 - General	Describe current conditions, and best management practices that will be followed to reduce the likelihood of introduction and spread of invasive species because of these activities;
U.S. Environmental Protection Agency	VEG01 - 1 - General	EPA recommends including in the DEIS an invasive plant management plan to monitor and control detrimental vegetation and transport of invasive species during construction; and discuss the potential for the new access roads to introduce invasive species into new areas.
Idaho Conservation League	VEG01 - 1 - General	The most cost-effective way to deal with noxious weeds is to protect strongholds of native vegetation from disturbance activities. Roads serve as major routes for noxious weed species expansion. The EIS needs to describe noxious weed management and treatment, including proposed use of herbicides. Management strategies may include ensuring the tires and undercarriage of vehicles are hosed down prior to site access to dislodge noxious weeds and frequent noxious weed surveys and control actions. If there are existing weed patches in the middle of a proposed infrastructure corridor, we recommend treating these weeds before construction begins.
Coalition to Protect America's National Parks	VEG01 - 1 - General	Spillover effects can also occur to native vegetation, including effects related to non-native plants or pollutants such as pesticides. We are particularly concerned to what extent, if any, kipukas within Craters of the Moon National Monument and Preserve may be subject to spillover effects of the proposed action. Kipukas36 are islands of vegetation surrounded by more recent lava flows within the greater Craters of the Moon landscape. There are over 500 kipukas in the area, which are vulnerable to spillover of nonnative species. Their ecological uniqueness and value is described in Proclamation 7373 of November 9, 200037, which significantly expanded the boundary of Craters of the Moon National Monument, then managed solely by NPS, to create the much larger national monument and preserve with portions managed by BLM and NPS respectively. As stated in the Proclamation: The kipukas provide a window on vegetative communities of the past that have been erased from most of the Snake River Plain [K]ipukas represent some of the last nearly pristine and undisturbed vegetation in the Snake River Plain, including 700-year-old juniper trees and relict stands of sagebrush that are essential habitat for sensitive sage grouse populations. These tracts of relict vegetation are remarkable benchmarks that aid in the scientific study of changes to vegetative communities from recent human activity as well as the role of natural fire in the sagebrush steppe ecosystem.
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	VEG01 - 1 - General	IV. The EIS should include analysis of threat of invasive annual grasses and strategies to minimize these. Human influences such as invasive species, altered wildfire regimes, and natural disasters are negatively affecting our native plant communities and the many species that depend upon them, including previously referenced wildlife species. Invasive species pose an enormous environmental challenge to western states and territories. Left unchecked, invasive species permanently alter ecosystems and negatively impact the native species and local economies that depend upon them42. Thus, invasive plant species act as one of the most significant change agents at landscape scales especially in the Great Basin portion of the West. Of specific concern is cheatgrass (Bromus tectorum). When an ecosystem transitions from sagebrush dominated to cheatgrass-dominated landscapes, fire-return intervals shorten from as long as a 100 or more years to as little as 3 to 5 years43. Just 1% of cheatgrass on the landscape doubles the risk of wildfire44. In areas with intense and frequent fires, nutrient recharge back into the system can be lost, and loss of sagebrush has become detrimental. In recent decades, these characteristic fire frequency and behavior caused by the influx of invasive annual grasses (notably cheatgrass) has become the largest threat to western sagebrush landscapes45. The National Interagency Fire Center has been tracking acres burned in Greater Sage-grouse habitat annually. For 2016-2020, among the 11 states where sage-grouse are found, sage-grouse habitat in Idaho comprised approximately 20% of the fires (1.3 million acres), reflecting how large of a problem this is in Idaho46. Science shows that invasive species control is more effective and cost-efficient when done early, before infestations become widespread, and when management responses are informed by what's going on in the surrounding landscape. Management actions must be prioritized, focused, and implemented in a collaborative manner to ensure the greatest conservation and restoration benefits47. Among these partners should be County Cooperative Weed Management Areas, to prevent the introduction, reproduction, and spread of invasive nonnative plants. The Cheatgrass Challenge is an example of a partnership of public and private agencies developing strategies to battle cheatgrass. This Idaho-focused effort should be considered as this project proceeds, as the partners have also compiled a strong suite of resources that can be used to proactively address this threat48. Among these is the Rangeland Analysis Platform that can be used by the project developer to map rangeland threats and implement a proactive strategy for addressing them.
Individual	VEG01 - 1 - General	A loss of useable grazing acreage due to construction of new access roads, wind turbine sites, and forage production (lbs./ac) loss due to disturbances, and increased populations of invasive species, annual species, and other undesirable vegetation will impact all livestock grazing by decreasing desirable forage production.
Individual	VIS01 - 1 - General	I'm writing as a Idaho native and current military officer. My military assignments have taken me around the country and world, exposing me to various types of energy production facilities. Currently I live in Hawaii and there are 2 wind farms on this island. Having seen and studied many energy options, I think that wind farms are NOT the way to go. By far, the biggest detriment is that they are a huge eye sore on the landscape. I can't imagine taking away from the beauty of Idaho landscapes with giant wind farms.
Individual	VIS01 - 1 - General	it's close to our homes and we don't want to stare at these windmills over our beautiful views of the deserts and mountains around us, so you can keep your windmills the hell out of our counties there is no amount of money that can replace what we have and I'm not interested in giving up any of our desert to send power out of state period
Individual	VIS01 - 1 - General	Having traveled in the midwest where I see a lot of wind turbines, they are an eyesore.
Individual	VIS01 - 1 - General	The adverse impacts of Lava Ridge would be evident across southern Idaho. Four hundred 740 foot tall turbines with blades exceeding the wingspan of a Boeing 747 will be spread across southern Idaho's high desert landscape creating an eyesore visible from Pocatello to Twin Falls. It's not just the Minidoka National Historic Site that will be affected. The impacts will be felt and seen throughout the area.
Individual	VIS01 - 1 - General	Don't want the parts left in area. Like in the Neely area all part laying around big mess
Individual	VIS01 - 1 - General	I am concerned about the proposed Lava Ridge wind turbine project. Aside from the unsightly nature of hundreds of wind turbines potentially over 700 feet tall, I see a practical issue.
Individual	VIS01 - 1 - General	The solitude and renewal of this mostly natural countryside felt by so many citizens would be intensely compromised.
Individual	VIS01 - 1 - General	Sight Vista - this project would change the vista along State Highway 24. In my opinion, not for the better.
Individual	VIS01 - 1 - General	Visual impact to Minidoka is also a significant concern. Minidokas National Register of Historic Places significance relies heavily on its sense of place. The Federal Government ripped Japanese-Americans from their lives and brought them to the high desert. They were brought as labor to turn Bureau of Reclamation desert land into agriculture land, although most of that conversion never was successful. A visual intrusion into this landscape is potentially a substantial adverse impact to this sense of place. If visual impact cannot be avoided, I strongly suggest that the Wind Project assess visual impact on the historic resource using the BLM Visual Resource Contrast Rating system or similar. Furthermore, Key Observation Points should be identified in consultation with the Minidoka National Historic Site, the Friends of Minidoka, and the Minidoka Annual Pilgrimage Committee, as they will have the keenest sense of how historians, archaeologists, visitors, survivors and descendants visit and utilize the site.
Twin Falls Historic Preservation Commission	VIS01 - 1 - General	Views from scenic and historic byways in southern Idaho would be altered by the wind farm. These specially designated routes, traveled by many tourists throughout the year, include the Peaks to Craters Scenic Byway from Arco to Highway 93 west of Carey, the Sawtooth Scenic Byway just north of Shoshone, the Thousand Springs Scenic Byway from Burley to Bliss, the Oregon Trail Auto Route along Interstate 84 from the Bliss area east to Raft River, and the Goodale Cutoff Auto Route from east of the Craters of the Moon

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		<p>to Fairfield. The scenic byways showcase the natural beauty of an area, while the auto tour routes generally follow historic trails, such as the Oregon Trail or its alternate routes. Views of the immense wind farm would certainly detract from the intent of the special designations, whether it be scenic or historic.</p> <p>Also, disruptions to traffic along Highway 93 leading to the Sawtooth Scenic Byway need to be considered. High traffic volume from the hundreds of workers and construction equipment going to and from the site would add to an already busy highway of tourists, recreationists, and commuters driving to and from the Hailey-Ketchum area. Dust resulting from the construction may cause visibility problems on both the Sawtooth, the Peaks to Craters Scenic Byways, and the Goodale Cutoff Auto Route. It would also be noticeable from Interstate 84 and other major roadways in Twin Falls County and could obscure the very views tourists and others want to enjoy.</p> <p>View from the Twin Falls Visitor Center to the northeast toward the planned project area</p> <p>Creating visual simulations of Key Observation Points (KOP) is critical in getting a full understanding of the impacts on viewscales. In Twin Falls County, KOPs could be made from several of the current or future NRHP sites like the Stricker-Rock Creek Station south of Hansen, the Milner Dam east of Murtaugh, and the Evel Knievel Jump Site on the Snake River Canyon near Twin Falls (possible NRHP eligibility in 2024). Walking trails, restaurants, and the Visitor Center along the south rim of the Snake River Canyon near the Perrine Bridge might also be considered for a visual simulation since the views are such an important feature in attracting use of the trails or businesses.</p> <p>Outside of Twin Falls County, KOPs could include simulations from the Minidoka National Historic Site near Eden, the Peaks to Craters Scenic Byway at and east/west of Craters of the Moon, Wilson Butte Cave northwest of Eden, and the communities of Richfield, Shoshone, and Dietrich.</p>
Magic Valley ATV Rider	VIS01 - 1 - General	Such construction in an area filled with fragile lava formations and lava tubes will result in destruction to the scenic beauty the area has to offer.
Individual	VIS01 - 1 - General	It will be an eye sore,
Individual	VIS01 - 1 - General	What will be the visual impacts we would are requesting a map of areas the project will be visible from?
Individual	VIS01 - 1 - General	We would contend that the culture of the area with this unique island of Buttes and lava desert sandwiched between the counties is in itself a large part of the culture of the region. The Kimama Butte land mark and its culture will be forever be destroyed Physically and visually, by this wind project.
National Park Service	VIS01 - 1 - General	The turbines may also be visible from high potential historic sites, as defined by the National Trails System Act (P.L. 90-543, as amended through P.L. 116-9, March 12, 2019), along the Oregon National Historic Trail. Of particular concern are the Stricker Store/Rock Creek Station, which is listed in the National Register of Historic Places (NR #79000810), and the Milner Ruts, which are located within the Milner Historic Recreation Area. The NPS recommends the visual resource analysis consider all aspects of viewsheds that support each sites historic integrity and contemporary visitor experience; and, consider how the turbines and associated project developments impact visitors desires to visit the sites and their ability to experience the historic and natural settings. The NPS recommends the visual resource impact assessment describe the visibility and potential impacts of the project to all NPS sites of concern in terms of proximity and contrast, the visual attention directed toward the turbines because of the motion of the blades, and the change in landscape character as viewed from the units. Photo-simulations should depict the project from identified viewpoints under high visibility conditions with additional simulations depicting various lighting and visibility conditions to support the analysis. For Minidoka NHS and the Oregon NHT, NPS requests the analysis consider the importance of historic viewsheds that support the historic integrity and contemporary visitor experience, as well as the visual prominence of the turbines and associated project developments and how these may affect visitors who desire to experience the historic setting and learn about Minidoka.. For Craters of the Moon NM&P, NPS requests this analysis also consider the affect the installation may have on the parks designated and proposed wilderness areas, including those within the Preserve.
Hidden Valley Organic Dairy Farm	VIS01 - 1 - General	With the installation of a windfarm in our area we are desecrating these memories. The beautiful historic sites that have been treasured for generations will be forever tainted by the sight and sound of over 400 industrial wind turbines that reach over 700 feet into the sky.
Individual	VIS01 - 1 - General	The visual pollution caused by the 400 wind turbines and towers, seven new substations, 198 miles of 34.5 kilovolt collector lines, 34 miles of 230 kV transmission lines, and 18 miles of 500 kV transmission line, 381 miles of access roads, 47 miles of temporary crane walk paths plus maintenance facilities and staging yards will create a rats nest of congestion. The scale of the project is all out of proportion to the environmental setting. The proposed site mocks the Boulder White Cloud Mountains, the pristine Pioneer Mountains, and the huge Lost River Range with Mount Borah, Leatherman, Mout McCaleb and a many other tall peaks, the Sawtooths to the north and Craters of the Moon to the east.
Individual	VIS01 - 1 - General	Some residents are bothered by the red blinking warning lights that disturb their sleep. I have heard complaints that the wind towers break up the scenic horizon and view of the Tetons.
Individual	VIS01 - 1 - General	<p>I ask if the following areas of interest might be impacted by the wind tower development.</p> <p>* The Central Idaho Dark Sky Reserve is a 1,416-square-mile dark-sky preserve near the Sawtooth National Recreation Area. This is the first International Dark Sky Reserve to be designated in the USA.</p> <p>* The Craters of the Moon National Monument is a favorite location for visitors, explorers, artists, and overnight campers. The astronomy club events, including the August 21, 2017, Solar Eclipse, were hugely popular.</p> <p>The 400 Lava Ridge wind towers could stand over 700 feet. It is possible that the towers might be seen from designated Idaho Scenic Highways and attractions. I have travelled these roads many times in different seasons and enjoyed the vast open spaces, scenery, and history. That privilege is exceedingly rare, continually challenged, and needs to be protected. For your consideration, the following areas might be impacted.</p> <p>* Sawtooth Scenic Highway on Idaho Highway 75 from Shoshone to Stanley</p> <p>* Peaks to Craters Scenic Highway 93 from Challis to Craters of the Moon Monument to Carey</p> <p>* Craters of the Moon National Monument</p> <p>* Minidoka National Historic Site</p>
Individual	VIS01 - 1 - General)Wilson Butte and Wilson Butte Cave will lose ALL of their aesthetic value.
Individual	VIS01 - 1 - General	- These short-lived turbines are a huge eyesore, they will forever change the horizon of our Magic Valley!
Individual	VIS01 - 1 - General	I live on justice grade which sits just above town or the valley. The landscape Is littered with wind turbines as far as the eye can see. I absolutely would recommend and oppose any such installation of a wind farm in in the Lava Ridge Area. I'm not a tree hugger or an environmentalist in any shape or form. I do not agree with destroying our beautiful landscape to supply power to areas that restrict such practices. We should not except a project like this in Idaho. More voice should be given to the people that already have these wind turbines in there backyards. When you have blinking red light all up and down the valley all over the planes it just sucks. There are better ways to drive power and wind turbines are one of the worst cost overtime benefits.
Friends of Minidoka	VIS01 - 1 - General	We request that the NPS be assigned the lead with regard to preparing the analysis of impacts to the visitor experience at Minidoka, given that NPS has special expertise regarding visitor experience, visual resources, natural quiet and night skies along with the history, and resources and values of the park. This approach is consistent with the Council on Environmental Quality s NEPA implementing regulations at 40 CFR 1501.8(b)(3) which provides that [e]ach cooperating agency shall: On request of the lead agency, assume responsibility for developing information and preparing environmental analyses, including portions of the environmental impact statement or environmental assessment concerning which the cooperating agency has special expertise. In addition, we request that the future NEPA documents include high quality visual simulation and modeling, including three-dimensional modeling of the proposed project.
National Parks Conservation Association	VIS01 - 1 - General	Impacts to visual resources: We ask that BLM work with the National Park Service (NPS) to develop an in-depth analysis and comprehensive modeling that shows the degree to which visual impacts will affect Minidoka and Craters of the Moon. We request that BLM work with NPS as a cooperating agency to fully understand the visual impacts from key locations in both park units.
National Parks Conservation Association	VIS01 - 1 - General	Of particular relevance to this proposed project are viewshed impacts, which would be best analyzed through GIS modeling. BLM should identify key observation points in Minidoka and Craters of the Moon and analyze visual impacts to visitor experiences in those areas from the proposed project. BLM must follow the mitigation hierarchy in evaluating those impacts, including developing alternatives to avoid and mitigate visual impacts, such as reducing the project size and footprint, relocating project infrastructure and phasing development.
Individual	VIS01 - 1 - General	Magic Valley Energy, LLC is basically ruining the aesthetic value of 73,000 acres; I personally do not know anyone who believes that the LARGEST Wind Turbines in the world are beautiful to look at. I do not want to see them in my area of influence, i.e. Idaho.
Individual	VIS01 - 1 - General	We have lived the greater part of our lives in Idaho and consider the beauty of the desert landscape a reason for us to remain in Idaho. The wide-open terrain draws visitors and tourists from all parts of the country. Wind turbines will disrupt the natural beauty of southern Idaho.

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Idaho Conservation League	VIS01 - 1 - General	<p>At minimum, the BLM and Magic Valley Energy/LS Power should create a viewshed of the project site, including all locations that would be in view of the wind turbines and associated above-ground electrical lines. These viewsheds could even inform models of scenic quality, such as Natural Capital Projects Integrated Valuation of Ecosystem Services and Tradeoffs (InVEST) scenic quality model. These landscape-level GIS analyses are an important first step in the visual resource impact modeling and management process.</p> <p>The next step of this visualization would be to create a visual model of the view(s) at important cultural sites including the Oregon National Historic Trail, Craters of the Moon National Monument and Preserve, and Minidoka National Historic Site. These visualizations should include the range of alternatives proposed throughout the NEPA process so that members of the public can accurately value the impact of the Lava Ridge infrastructure on the scenic quality of all areas within the projects viewshed.</p> <p>The BLM should not rely on the types of displays that are customarily in use at public meetings or photographs that are commonly used in paper copies of a DEIS. In person meetings are in question due to Covid and members of the public interested in this project span the entire continent. The technology exists to allow for visual simulations accessible via computer. Just as Google Maps can transport any user to a street view on the ground, for this project the BLM should allow any member of the public to transport themselves to any one of several observation points. These observation points would be based on a photograph and be overlaid with the wind turbine and transmission lines configuration per each alternative. It should even be possible to allow people to scroll left or right for a 180 degree view of the landscape and to zoom in as desired. This immersive technology is currently readily available and could be adapted to incorporate the range of alternatives. We recommend selecting several key observation points from the Minidoka National Historic Site, one or more from Craters of the Moon, and one each at Wilson Butte, Cinder Butte, Owinza Butte, Sid Butte and Kimama Butte.</p> <p>It is important to not stop at the modeling of viewsheds and visualizations. These materials can provide sources in which to evaluate and manage the scenic and visual resources in the project area. For example, the BLM and Magic Valley Energy/LS Power could have members of the public and of target stakeholder groups prioritize the visual models from most to least visually appealing, thus creating a scale of valuation for scenic and visual impacts of the project proposal. Furthermore, economic valuations such as a contingent valuation study or hedonic pricing model could evaluate the economic impact of the Lava Ridge project on the surrounding area.</p>
Individual	VIS01 - 1 - General	<p>Visual Impacts</p> <p>The projects visual impact on the region must be thoroughly analyzed with a full suite of Key Observation Points. No spatial analysis of visual impacts was presented by the applicant at the April 24th 2021 information session at the Lincoln County Community Center. This lack of analysis on local and regional viewshed and scenic values, including specifically to Craters of the Moon National Monument and Preserve as well as the Minidoka National Historic Site, must be remedied, if not already addressed. I want to know what I will see when I visit Craters of the Moon National Monument and climb to the top of Inferno Cone or when I drive across Laidlaw Park within the Preserve. How will I be able to effectively explain to my young children how the internees at Minidoka felt in that landscape when now there are large, white, spinning propellers within a short distance? Given that the existing smaller wind turbines located west of Hagerman in the Bell Rapids area, are fully visible both during daytime (due to their height and position) and nighttime (due to their aircraft warning lights) from the US highway 93 corridor some 30 miles away, how will the proposed project not generate significant visual impacts across wide swaths of Southern Idaho? Additional Key Observation points should include Notch Butte/US Highway 93 corridor, Mount Bennett Hills/State Highway 46 corridor, and Pomerelle Ski Area/Mount Clevelandall areas with significant recreational values and high use, with elevated positions in the regional landscape</p>
Japanese American Confinement Sites Consortium	VIS01 - 1 - General	<p>JACSC further requests that BLM eliminate visual impacts as seen from Minidoka National Historic Site. In order to ensure that these impacts have been fully considered, we request that BLM conduct visual impact modeling to provide accurate, to scale photo simulations of the proposed towers and their proposed heights and locations, for each alternative, so that the public may fully understand the potential viewshed impact to the site. We request that these simulations represent viewshed impact to multiple vantage points from the park. There must be reasonable alternatives to the current proposal to preserve the sites viewshed, with full transparency of these impacts to the public in advance of the next phase of public comment.</p>
Individual	VIS01 - 1 - General	<p>For a project of this magnitude, view-shed impacts will also be unavoidable and are likely to be present at a regional scale given the generally low topographic relief that predominates and the unprecedented height of the proposed turbines. In fact, I believe it is likely that Lava Ridge powerlines and turbines, with their moving blades and the lights that will be required for operation, would be highly visible at distances of 20 - 30 miles or more from the proposed project area. At distances of 10- 20 miles or less from the proposed project area, Lava Ridge components would be major sources of visual contrast.</p>
Individual	VIS01 - 1 - General	<p>Indirect impacts would result from the addition of industrial facilities to the previously undeveloped and rural landscape. Viewsheds associated with the Minidoka National Historic Site, Wilson Butte Cave, other National Register properties, Craters of the Moon National Monument, Hagerman Fossil Beds National Monument, Lake Walcott State Park, and other visitor centers within the proposed project footprint and as far as 20 - 30 miles away could be permanently altered in a manner that would compromise integrity and significantly diminish the experience of visitors. Night Sky designations and experiences could also be compromised. Formal analyses of the potential visual impacts of the proposed Lava Ridge Wind Project will be essential to understand and minimize these adverse impacts.</p>
Coalition to Protect America's National Parks	VIS01 - 1 - General	<p>Various studies indicate that large wind turbines in a western landscape can be visible to the human eye up to 36 miles away. For example, a 2011 study¹ prepared for the Clean Energy States Alliance found that, In general, visual impacts are greater when objects are seen at close range. Wind turbines may be seen from 15-25 miles and even farther under optimal atmospheric conditions If a project dominates the views from highly sensitive viewpoints to such an extent that it would significantly harm scenic resources that are clearly valued within the region, it is likely to have unreasonable or undue visual impacts. Note: We and many others would consider Minidoka NHS to be a highly sensitive viewpoint. In a 2012 study² prepared by the Argonne National Laboratory for BLM, 377 observations of five wind facilities in Wyoming and Colorado were made under various lighting and weather conditions. The facilities were found to be visible to the unaided eye at >58 km (36 mi) under optimal viewing conditions, with turbine blade movement often visible at 39 km (24 mi).</p> <p>The Lava Ridge Project Area Map³ above illustrates that the majority of wind turbines would be located within 5-20 miles of the NHS. As a result, the proposed wind farm would be highly visible, dominate the landscape, and overwhelm the scenic vistas immediately north and northeast of Minidoka National Historic Site (NHS), thus causing unacceptable impacts to, and likely impairment of, protected resources and values within a unit (or park) of the National Park System.</p>
Coalition to Protect America's National Parks	VIS01 - 1 - General	<p>Comment # 4: The DEIS should include a summary of the gaps and shortcomings in applicable BLM land use planning documents as they relate to the Proposed Action and potential adverse impacts to visual resources.</p> <p>These documents include, but are not limited to, the following:</p> <p>A. January 1986 Monument Resources Management Plan (RMP)²⁴: The RMP is grossly outdated and does not serve as a valid basis for justifying the siting of the proposed wind farm. The RMP did not contemplate the creation of Minidoka Internment National Monument by Presidential Proclamation in 2001; or the establishment of Minidoka NHS by act of Congress in 2008. Nor did the RMP include a Visual Resource Management (VRM) inventory, analysis, or classifications²⁵ that would serve as a valid baseline for determining the appropriateness of future development; or, in this case, for evaluating potential visual impacts of the proposed wind farm.</p>
Coalition to Protect America's National Parks	VIS01 - 1 - General	<p>Other plans in effect for the Twin Falls District²⁷ None of the plans in effect identified on BLM Idaho's planning website for the Shoshone Field Office contain the requisite Visual Resource Management (VRM) class information for the project area.</p> <p>Lacking such information, please explain how BLM determined it would be appropriate to consider and potentially allow a massive wind energy development in the immediate vicinity of Minidoka NHS, a unit of the National Park System.</p>
Coalition to Protect America's National Parks	VIS01 - 1 - General	<p>Comment # 8: There should also be an analysis of visual impacts to Minidoka NHS and the surrounding landscape based on BLMs Visual Resources Management (VRM) classification system. However, apparently BLM has never conducted a baseline VRM classification for the project area. In order for such as assessment to be credible at this stage of the planning process, BLM and NPS should hire an independent third-party contractor (e.g., Argonne National Laboratory³¹) to conduct the baseline VRM assessment and classification.</p> <p>In principle, BLM should already have prepared a baseline VRM assessment and classification during one of its previous land use planning processes for the area. However, as noted previously, the grossly outdated 1986 Monument RMP and the 1994 ROD for the Southwest Intertie Project (SWIP) contained no such assessment; and we can find no such information in any of the other plans that are in effect for the Twin Falls District listed on BLMs Idaho Plans and NEPA webpage.³²</p> <p>As explained on the BLM Visual Resource Management (VRM) Classes website³³, [w]hen Visual Resource Management (VRM) class objectives are designated for the lands in an RMP, management actions and allowable uses are determined that reflect the VRM class objectives. (Emphasis added.) In other words, it is important to conduct the VRM classification process prior to proposed development; so that the respective VRM class objectives can be fully considered in determining whether the proposed development is appropriate or not. Unfortunately, that does not appear to be the case for the Lava Ridge project.</p> <p>From the perspective of Minidoka NHS, a unit of the National Park System and a listed property on the National Register of Historic Places, one would reasonably expect the proper BLM VRM classification for the surrounding landscape to be either:</p> <p>1)VRM Class I, with the objective: To preserve the existing character of the landscape. Allowed Level of Change: This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention; or</p> <p>2)VRM Class II, with the objective: To retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.</p> <p>To be frank, if BLM were to conduct a baseline VRM classification for the project area now after a massive wind farm has already been proposed, the classification results will be controversial regardless of outcome. The results will be viewed either as unfair by the project proponent if a VRM Class I or II determination is made that essentially precludes the project from occurring at this site; or will be seen as lacking credibility by the Nikkei and conservation communities if a VRM Class III or IV determination is made that, in effect, minimizes or dismisses legitimate concerns about visual impacts to Minidoka NHS.</p> <p>As a result, we strongly recommend that BLM and NPS hire an independent third-party contractor (e.g., Argonne National Laboratory³⁴) to conduct such a baseline assessment and VRM classification.</p>
Shoshone-Bannock Tribes	VIS01 - 1 - General	<p>The Tribes are concerned with adverse impacts to the visual landscape as valued from a tribal perspective. The Tribes request that a view shed analysis be done with full participation and input from the Tribal Cultural Resources staff. The Tribes have a unique perspective on the cultural value of the visual landscape, as also considered from seasonal and daily key observation points.</p>

Commenter	Comment Code	Comment Text
Individual	VIS02 - 2 - Night Sky / Dark Sky	Another Large issue that these huge windmills will do is cause a huge amount of light pollution in our night time skys.
Individual	VIS02 - 2 - Night Sky / Dark Sky	Flashing lights at night, which would totally distract night solitude.
Individual	VIS02 - 2 - Night Sky / Dark Sky	2. Blinking lights night and day so distracting. Either turn off or shroud so as not to be seen from the ground.
Individual	VIS02 - 2 - Night Sky / Dark Sky	Imagine a group of youth going on a trip to explore the wind caves and instead of the quiet, stillness of the night to contemplate the wonders of nature, there is only dust, traffic and the ever-Blinking red lights of the night sky.
Individual	VIS02 - 2 - Night Sky / Dark Sky	Imagine an outing to the top of Kimama Butte in the evening to see the brightness of the stars and the Moon as bright as day. Never again if this projected is allowed to proceed. Nothing but hundreds of blinking red lights that never stop. It won't matter where you live in the surrounding counties. The blinking red lights will forever be the most prominent visual feature. Truly, a RED light district. No more beautiful sunsets or sunrises over our desert island Buttes just hundreds of Blinking red lights some of them 700 hundred feet high. The lights will affect the scenic quality, Perhaps Richfield to the North and Twin Falls or even Oakley will have the night forever changed. This is probably the biggest impact of all.
National Park Service	VIS02 - 2 - Night Sky / Dark Sky	Night skies are a critical component of natural, cultural, and historic resources across the NPS. The night skies at Minidoka NHS contribute directly to the sense of isolation those incarcerated felt and are thus integral to its cultural and historical setting, feeling, and association. Craters of the Moon NM&P hosts some of the darkest night skies in the NPS and is a certified International Dark Sky Park. It is also located in one of the few regions in the United States preserving natural light and dark cycles nearly absent of anthropogenic light pollution. Concern: The NPS is concerned that the project could add up to 2,400 aircraft warning lights, with most of the lights directly visible from the Minidoka NHS Visitor Center, thereby impacting feelings of isolation. The night skies at Minidoka are integral to its cultural and historical fabric and, accordingly, the NPS is concerned that the impacts on dark skies above the park and direct line of sight to lights on the horizon could significantly alter visitors' experience and capacity to see the nightscapes experienced by incarcerated Japanese Americans at the camp. Recent baseline night sky conditions completed by the NPS reveal the darkest portion of the sky as seen from Minidoka NHS Visitor Center is in the direction of the Project (Night Sky Condition Assessment from Minidoka National Historic Site and Craters of the Moon National Monument and Preserve, September 2021).
National Park Service	VIS02 - 2 - Night Sky / Dark Sky	The NPS Natural Sounds and Night Skies Division is available to share resources and experiences from other projects. The NPS appreciates the BLMs and applicants early coordination in modelling potential impacts to night sky brightness. To fully anticipate potential changes to the nighttime scene NPS suggests identifying the nighttime visibility threshold of the project as well as nighttime photo simulations depicting the project with turbine and facility lights on from each park Key Observation Point (KOP).The NPS also appreciates the BLM and applicant coordination with the Federal Aviation Administration for deployment of an Aircraft Detection Lighting Systems (ADLS) and recommends approval of this ADLS system if safety considerations allow. Furthermore, given that the permanent turbine lighting, temporary construction lighting and associated facility lighting would have night sky effects, the NPS requests the opportunity to share NPS outdoor lighting best practices in parks, and to participate in the development of the project Lighting Plan to minimize impacts during construction and operation phases to the night viewing experience and to wildlife. NPS encourages the use of the Illuminating Engineering Society Environmental Considerations for Outdoor Lighting standard (IES LP-11-20) for guidance on minimizing environmental impacts.
Individual	VIS02 - 2 - Night Sky / Dark Sky	The mandatory warning lights for the Lava Ridge wind towers and infrastructure facilities would contribute substantial light pollution and ruin the dark sky experience. The Minidoka NHS is not the only area affected.
Idaho Conservation League	VIS02 - 2 - Night Sky / Dark Sky	Not only can the view of wind turbines during the day impact the visual and scenic quality of an area, but the flashing red lights for aviation can impact night skies as well. ICL supports the use of radar detection systems such as aircraft detection lighting systems to mitigate any need for continuous operation of night time red lights. If light pollution is an issue, there are a number of Dark Sky related measures that could be adopted in the larger area to serve as an offset and potentially result in a net decrease in light pollution. Craters of the Moon is already a designated Dark Sky Park, but light pollution from other areas is marring night sky observations. Light pollution prevention measures could be considered by surrounding communities. A Dark Sky designation may even be tailored to fit the community's circumstances and wishes. We recognize the interest in accelerating project completion and understand that mobile light plants may be employed to allow for construction at nighttime. We recommend employing both light and noise pollution measures during nighttime construction activities and considering seasonal restrictions as needed to reduce impacts to wildlife.
Individual	VIS02 - 2 - Night Sky / Dark Sky	This area is also close to the Craters of the Moon National Park. Many people visit this area for astrophotography due to the dark skies. The required lights for each turbine will destroy the dark skies we currently enjoy.
Individual	WATER01 - 1 - General	Windmills will also change the natural wind patterns in the area and affect our climate and change the way snow falls and drifts in the desert.
National Park Service	WATER01 - 1 - General	Surface water is extremely limited in the semi-arid landscape of southern Idaho. Given the scarcity of water and the now 20-year drought gripping the intermountain West, groundwater aquifers play a very important role in southern Idaho's ecosystems. Concern: The NPS is concerned that the project could introduce a new local use of water for concrete mixing, dust suppression, and other activities such as washing trucks and hydrating aggregate during the construction phase. Changes in local hydrology and water availability could impact the well water supply and surface water and groundwater expressions at neighboring NPS units. Recommendation: The NPS recommends as part of the NEPA process that the BLM identifies the source of water to be used for drilling operations, concrete mixing, fugitive dust control, and restoration efforts. If groundwater or surface water are proposed to be directly used, the NPS also recommends the BLM complete an analysis of changes in groundwater flow or surface water availability. The NPS requests to work with BLM to identify and minimize changes to hydrology and water availability that could impact the water supply, and surface water and groundwater expressions at neighboring NPS units. The NPS also requests an opportunity for early review and input to the Water Supply Assessment or other water use analysis.
Individual	WATER01 - 1 - General	With all the road construction how will that affect natural water flow to ponds and lakes? Those include Owinza Butte Lake, Mallard Lake, Cross Roads Reservoir, Seeding Reservoir and Star Lake.
Individual	WATER01 - 1 - General	Not only is this desert valuable for ranchers and enjoyed by recreationists and hunting enthusiasts but it has miles and miles of valuable pipelines along with water troughs that have taken years to install and require a tremendous amount of time, energy, and money to maintain not only for the use of livestock but also for the wildlife and birds to have access to water. The installation of these windmills will deteriorate that ecosystem.
Friends of Minidoka	WATER01 - 1 - General	Please include an analysis of the impact of the wind project on the delivery of water to crops. By creating updrafts, wind turbines can increase evaporation of water needed for agriculture and are associated with increased ground surface temperatures, which could accelerate evaporations. Please include an analysis of cumulative effects of the wind project along with climate change on local farmers.
National Parks Conservation Association	WATER01 - 1 - General	Impacts to hydrology: Water use for the construction and operation of the project could impact local hydrology. We request an analysis of local water resources including springs and seeps.
U.S. Environmental Protection Agency	WATER01 - 1 - General	Section 303(d) of the Clean Water Act (CWA) requires the state of Idaho and Tribes with the EPA- approved water quality standards to identify water bodies that do not meet water quality standards and develop water quality restoration plans to meet established water quality criteria and associated beneficial uses. Because of that, EPA recommends the DEIS include the following information: Impacted waters, the nature of the impacts, and specific pollutants likely to affect those waters; Water bodies potentially affected by the project that are on the most recent EPA-approved 303(d) list; Existing restoration and enhancement efforts for those waters and how the proposed project will coordinate with on-going protection efforts, as well as any mitigation measures implemented to avoid further degradation of impaired waters; How the project will meet the antidegradation provisions of the CWA. The provisions prohibit degrading water quality within water bodies that are currently meeting water quality standards; Cumulative effects from this and other projects on the hydrologic conditions of the analysis area and vicinity, including reasonably foreseeable direct, indirect, and cumulative impacts to groundwater and surface water resources. For groundwater, identify potentially affected groundwater basins and any potential for subsidence, and analyze impacts to springs or other open water bodies and biological resources; Whether the project has applied for a construction storm water discharge permit or National Pollutant Discharge Elimination System permit for discharges to surface waters of the United States since it will disturb a land area of 5,400 acres or more during its construction. The DEIS will need to document the project's consistency with applicable storm water permitting requirements and discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality and aquatic resources due to the discharges; and Potential contamination of drinking water sources that may result from the project, the contaminants of concern, and measures that will be taken to protect drinking water sources for communities in and adjacent to the planning area.
U.S. Environmental Protection Agency	WATER01 - 1 - General	Floodplain impacts and actions to be taken to minimize the impacts. Activities affecting floodplains are regulated under the CWA 404 and Executive Orders 11988 and 13690.1,2
Individual	WATER01 - 1 - General	The area will also have unnatural water runoff events that will not be advantageous.
Idaho Conservation League	WATER01 - 1 - General	Due to increasing climate uncertainty, the Stormwater Pollution Prevention Plan should plan for 500-year events.

Commenter	Comment Code	Comment Text
Idaho Conservation League	WATER01 - 1 - General	The BLM should detail how blasting materials such as ammonium nitrate be used in construction and how such materials may affect groundwater quality and water quality in surface expressions.
U.S. Environmental Protection Agency	WATER02 - 2 - WOUS	Because the proposed action could impact waters of the United States, EPA recommends the DEIS include the following information: Description of all Waters of the U.S., including wetlands that could be affected by the project alternatives; Maps showing waterbody locations and resources the project could impact; Acreages and channel lengths, habitat types, values, and functions of these waters; Potential discharge of dredged or fill materials into surface waters of the U.S. and the most current information related to the status of authorization by the U.S. Army Corps of Engineers; Mitigation plans, including compensatory mitigation required under the CWA, to reduce impacts to surface Waters of the U.S.; and
Individual	WATER03 - 3 - Groundwater	The new wells. Where does this water come from in the hierarchy of water restrictions the eastern side of the state must observe?
Individual	WATER03 - 3 - Groundwater	I live and farm in the Hunt area. The proposal so a wind Mill within a few hundred feet of my farm. I do not think this project is a good idea and it will not be in the best interest of the people of Idaho. First it is proposed to be built on the top of the snake river aquifer. The blasting that will be require to construct the wind mill and the vibrations the will mills will cause has a great chance of changing the course of the aquifer and affecting a large number of water rights. Building the roads will also alter the natural drainage of the Desert and affect water run off into the aquifer.
Individual	WATER03 - 3 - Groundwater	The proposed corridors overlay the Snake River Aquifer recharge zone managed cooperatively by the Idaho Department of Water Resources and local agriculture co-ops. I would consider consulting with area farmers and ranchers on your need to drill six new groundwater wells during construction and on the need to keep four in operation after construction. There could be an opportunity to lease or purchase water rights from local stakeholders, or you could offset some of your costs by making the new well sites stock-water sites for ranchers.
Individual	WATER03 - 3 - Groundwater	12. Have the effects of the vibration on the aquifer been studied?
Individual	WATER03 - 3 - Groundwater	What are long term effects on our precious aquifer, of 400 turbines attached deep in the earth vibrating for decades? Has that effect been thoroughly studied? Especially on the wells closest to the large turbines. If we make a mistake and we hurt the aquifer the cultural concerns to the people of the entire region are unmeasurable.
Individual	WATER03 - 3 - Groundwater	How will the proposed wells impact ground water levels for existing users? Will Idaho Department of Water Resources require a bond for the wells and mitigation for water loss to local farmers if the water table drops to levels that result in farmers unable to irrigate?
Hidden Valley Organic Dairy Farm	WATER03 - 3 - Groundwater	Water is life. This is a fact that everyone in our area is acutely aware of. Even if you are not a farmer or a rancher, you know that water is the lifeblood of our area. There have been studies that show that the vibrations that are caused by industrial wind turbines can damage wells and maybe even the aquifer. "The development of a wind farm has the potential to impact on groundwater quality, groundwater quantity and/or the established groundwater flow regime. The key impacts to groundwater that can result from the construction, operational and decommissioning stages of wind farms are summarized in Table 1 below. Table 1: Potential impacts on groundwater from wind farms [see table in full comment] (Northern Ireland Environment Agency, 2017) In addition to this information there have also been stories of communities whose well water has been contaminated or their wells have collapsed due to the vibrations that the wind turbines send into the ground. Our area is already hurting for water from year to year. On some farms the only source of water is from wells. Our aquifer is finally starting to recover but we have learned how fragile and precious water is over the years. No one in our area has the desire to put the source of all life in Lincoln County in jeopardy.
Hidden Valley Organic Dairy Farm	WATER03 - 3 - Groundwater	The decommissioning of windmills is also a threat to our water supply. As previously mentioned, the decommissioning of windmills is the practice of digging a hole and dumping in the turbine parts and recovering it up. Over time the materials will rust and may contaminate our water.
Individual	WATER03 - 3 - Groundwater	I am totally opposed to the windfarm being contemplated for Lincoln and Minidoka counties. Main reason are the larger amount of water that is requited to operate the facility, We have a serious draught in this area and the water will come from the aquafer that feeds the immediate are and Hagerman valley.
Individual	WATER03 - 3 - Groundwater	4)The Snake River Aquifer is already an over used resource, so to put another 60-90 million gallon demand on it is not a wise decision.
Individual	WATER03 - 3 - Groundwater	- It will only further the competition for our natural resources in the area. Our surface and groundwater is already in short supply. This project will tap into the limited groundwater supply by drilling of new wells and jeopardize the existing water right holder's claims to nearby water storage areas.
Individual	WATER03 - 3 - Groundwater	Documents do not address the requirements for procuring water rights or well drilling permits for the proposed new wells. I did not see a plan for water conservation to minimize waste and unnecessary use of Idaho's most precious resource.
Individual	WATER03 - 3 - Groundwater	There's are aquifer recharge sites in that area. Windmills leak oil. Have any considerations been made to address potential contamination of the aquifer?
Individual	WATER03 - 3 - Groundwater	Farming in an arid desert region poses many challenges and difficulties, one of them an adequate source of water and shallow soil. The proposed wind projects gives me serious concerns about the potential damage the harmonics of the turbines will cause to the wells deep in the aquifer. I worry their could be collapsing of wells by the vibrations of the wind turbines.
Individual	WATER03 - 3 - Groundwater	This project will use water on the project that the BLM nor the Magic Valley Energy LLC, an affiliate of LS Power, has any right to use! We are currently in a drought situation which adversely affects surface and ground water!
Idaho Conservation League	WATER03 - 3 - Groundwater	The construction of Lava Ridge would require a great deal of resources to construct, including water. Each wind turbine foundation would require around 21,600 gallons of water for the turbine foundations. To get a sense of the required water use, this means that for every three wind turbines constructed, an olympic swimming pools worth of water would be used just to create three foundations. The entire projects water needs could fill over 133 olympic swimming pools for the turbine foundations. The primary land use in the proposed project area is agriculture. Magic Valley Energy/LS Power intends to develop up to six new groundwater wells during construction and four during operations and maintenance. An unknown amount of water will likely be needed for dust suppression during construction and operations. The BLM should consider the use of magnesium chloride on unpaved routes or paving certain high use roads or intersections in order to address dust issues and save water. The DEIS should consider the impact of this much water use on the local water supply, which is already limited. In terms of mitigating the increased water use, there are likely to be a number of water conservation measures that could be implemented in and around the project area for existing operations. Having Magic Valley Energy/LS Power support these conservation measures could be helpful. There is also the potential for improvements in waste management so that existing agricultural operations have the tools and resources to improve water quality leaving their operations and entering the groundwater or surface water.
Individual	WATER03 - 3 - Groundwater	The issue of water is always a concern. We don't have enough already and I understand they will need some water for the project. Where is that water coming from and how will it affect the flows in the aquifer?
Individual	WILD01 - 1 - General/Other	I writing this as a concerned citizen of jerome County of 40yrs ,I was born and raised in Jerome I have 5 generations of family here ,My family and I have enjoyed many things about this area and I have great concerns about this lava ridge project, it may be something that big government wants but it is not what we want for our community, I'm a huge hunter and outdoors men I know what kind of impact this will have not only for the animals that live in the area but it is also a huge migration area also with sage grouse trying to make a come back in the area which is a protected species in areas such as the proposed areas to build these unsightly wind mills
Individual	WILD01 - 1 - General/Other	It will disturb the natural habitat for Desert animals. It is proven that Windmills Kill many Birds every year. In this area we depend on Birds to help control the vole population.
Individual	WILD01 - 1 - General/Other	How can you give up 7,800 acres for a wind project and not disturb the wild life, the roads, the infrastructure in these counties?

Commenter	Comment Code	Comment Text
Individual	WILD01 - 1 - General/Other	We live and farm south of the Minidoka desert, were for years we have ridden our ATV with our family and friends. On our trips to the desert, we see all kinds of wild game (elk, antelope, sage grouse). We walk into Bear Park yearly just to admire the elk, I have seen water huts for sage grouse and other game, thanks to BLM. We have been riding there for years and still have not seen all its beauty, there is so much to see. The desert has a lot to offer if we take care of it. The thought of wind turbines and all the damage of construction and disturbing the wildlife, makes me ill.
Individual	WILD01 - 1 - General/Other	Regarding the Lava Ridge Wind project I would like to see the BLM watch out for the wildlife in the area and analyze the affects the project would have on birds like Eagles, hawks, and owls as well as game birds, bats and game animals from habitat loss, as well as noise pollution. I am also curious to know the impacts the increased construction traffic will have on wildlife and their habitat.
Individual	WILD01 - 1 - General/Other	We need to make sure wild life if taken into account and technologies implemented to reduce wildlife disruption.
Individual	WILD01 - 1 - General/Other	<p>The BLM, of course, is in charge of managing most of the land where the project is proposed. This land provides habitat for wildlife, food for livestock, and in this case, the atmosphere above the land supplies wind energy to power the proposed wind turbines. Furthermore, the BLM is charged with protecting archeological and historic sites, such as, Wilson Butte Cave and Minidoka Internment Camp.</p> <p>The land where this project is proposed is an ecosystem called "Sagebrush Steppe," according to "Sammy's Quest to Save the West."2 This ecosystem is home to over 350 species of plants and animals.</p> <p>Our sagebrush ecosystem ...</p> <p>serves as a nursery that protects young elk, golden eagles, mule deer, pronghorn antelope, pygmy rabbits, and sagebrush lizards so that they can grow into strong adults</p> <p>provides beautiful open spaces where people find fun, recreation, and renewal.</p> <p>yields food for livestock and materials for roads, schools, homes, and cars.</p> <p>contains energy resources to fuel the country's economy.</p> <p>is part of western heritage.</p> <p>In fact, other amphibians and reptiles that may be present on this land as evidenced in Amphibians and Reptiles of Idaho3 include western toad, sierran treefrog, boreal chorus frog, great basin spadefoot, northern leopard frog, longnose leopard lizard, western fence lizard, sagebrush lizard, short horned lizard, side blotched lizard, western whiptail, desert horned lizard, and western skink. Several snakes surely inhabit this ecosystem including the rubber boa, night snake, striped whipsnake and others. Not to mention the smaller organisms that occur here including insects, biocrust, and other sagebrush steppe obligates. A variety of plant species function as the producers in this sagebrush steppe ecosystem and must be preserved to enable these animals to exist here.</p> <p>As proposed, the Lava Ridge Wind Project includes ...</p> <p>400 wind generating turbines, with heights up to 740 feet</p> <p>Up to 7 new substations</p> <p>Approximately 250 miles of transmission lines</p> <p>428 miles of roads</p> <p>A battery energy storage system</p> <p>Three operations and maintenance facilities</p> <p>Five permanent met towers</p> <p>Construction related staging yards</p> <p>Approval of an energy project of this magnitude would have a severe net negative impact upon this almost virgin sagebrush steppe ecosystem. The well-being of this ecosystem must be the priority of this Environmental Impact Statement.</p> <p>Upon reviewing the Lava Ridge Wind Project map, I noticed the projected acreage of BLM land is almost totally confined by agricultural land. This small, fragile ecosystem would be highly fragmented (habitat fragmentation). The natural migration route of the BLM land between the agricultural land of Dietrich and that of Hidden Valley would be severely interrupted. There is also a natural migration route to the northwest, between Dietrich and Jerome ag land. In effect, the natural state of this land would be critically compromised if the Lava Ridge Wind Project were approved.</p>
Individual	WILD01 - 1 - General/Other	Some present roads allow ranchers, hunters, and some 4-wheeler and side by side enthusiasts access. More road access from the southern highly populated areas of Jerome, and Twin Falls for ATV enthusiasts would be detrimental to this fragile ecosystem.
Individual	WILD01 - 1 - General/Other	Executive order 14008 cites the "goal of conserving at least 30% of our land and waters by 2030. 5 Ecosystems at risk; humans converting habitat; exploitation; biodiversity changing at accelerating rates; we face a frightening future; economic growth grabbing more and more; we are wasting time; conserve biodiversity and wilderness; make a profit and still preserve nature! The future will look back on this generation with absolute horror! 6 Together we can create a better future; what happens next is up to every one of us!6
Individual	WILD01 - 1 - General/Other	14. What is the potential of the effects of 300+ miles of roads have on grazing and on the elk, and other wildlife?
Individual	WILD01 - 1 - General/Other	Please consider all impacts including the direct, indirect, and cumulative impacts of the project on native plants and wildlife. That much fragmentation, road networks, transmission lines, etc. will effectively sever the habitat of many different species, including sage-grouse, pygmy rabbit, pronghorn, mule deer, migratory birds, small mammals, and predators.
Prescott Land and Livestock	WILD01 - 1 - General/Other	8) Wildlife are always a concern for both permittees and the general public. What will be done to preserve the current populations?8a) Proposed solution: Collect adequate species and population data and formulate a plan to reduce pressure on the wildlife. The wind turbine project could push wildlife even further into adjacent crop fields. Farmers should be made aware of the potential additional pressure on their crops.
Individual	WILD01 - 1 - General/Other	These allotments support elk, deer and antelope herds and are active hunting and recreation areas. This activity will no doubt also be impacted. Eagles, hawks, owls, waterfowl, gamebirds, song birds and bats all inhabit the allotments, how will they be affected?
Prescott Land and Livestock	WILD01 - 1 - General/Other	The increased infrastructure and land disturbances will also result in reduced forage production. This in turn, may lead to decreased wildlife habitat, wildlife populations, decreased upland game birds, and other decreased animal populations.
Individual	WILD01 - 1 - General/Other	Many of us have lived in the immediate area for many decades. We have observed, with the exception of Elk, a general decrease in the amount of wildlife in the area. This project with its 380 miles of roads will simply finish them all off. There are programs and policies to restore Sage Grouse, which used to be plentiful. Fox, Skunks, Badgers, Coyotes, Bobcats, Cottontail and Jack Rabbits are all on the decline and need enhanced habitat to recover. Birds of prey are of particular concern, there used to be many more Hawks of many types. Turbines, some over 700 ft high, have adverse effects on birds that is well documented. Golden and occasionally bald eagles are here every fall and winter. Owls need help not reduced habit. There are Huns and used to be Chucker. There are still some Pheasants, and Morning Doves. Mule Deer use the area as a migratory route south in the winter. Antelope and Deer used to be more abundant. Many have their young in the desert crags. The harassment and loss of habitat will drive them out or finish them off. All of the species are supported by the farms but they need the desert for refuge to survive and thrive. There are migratory birds, such as Canadian Geese, Snow Geese, Swans, Pelicans, many Duck species, and even Trumper Swans here in the winter and spring. All the species will be adversely affected if not killed by this project. There are Swallows, Sparrows, Robins, Raven, Crows, and many more. The effects of that many roads and increased traffic alone, will finish them off.
National Park Service	WILD01 - 1 - General/Other	Connectivity between habitats is key to sustaining wildlife populations that are increasingly threatened by habitat loss and fragmentation. Craters of the Moon NM&P is home to large mammals like elk, mule deer, moose, black bear, and pronghorn that must cover a large territory to find food and water or migrate across the landscape. The park also actively monitors the greater sage grouse and helps to preserve sagebrush steppe habitat the species depends on. Concern: Habitat fragmentation resulting from road development and powerlines have the potential to negatively impact native mammals and birds found in the park. The Project is proposing up to 381 miles of new roads and 250 miles of transmission lines to the area. The Idaho Department of Fish and Game has identified the section of Highway 24 adjacent to the proposed project footprint as a wildlife linkage for mule deer, pronghorn, medium-sized carnivores, and sage grouse (Wildlife Linkage Report for Idaho Transportation Districts 3, 4, & 5). Telemetry studies have documented sage grouse moving between the project area and Craters of the Moon NM&P. Recommendations: The NPS recommends analyzing impacts to connectivity for wildlife such as mule deer and other species that move among the park and the project area.
Hidden Valley Organic Dairy Farm	WILD01 - 1 - General/Other	In Southern Idaho we boast a wide variety of wildlife including bats, sage grouse, hawks, and eagles. All of the listed animals, and many more, will be heavily and negatively impacted by the installment of industrial wind turbines. There is not a single animal that would benefit from this project in our area.
Hidden Valley Organic Dairy Farm	WILD01 - 1 - General/Other	<p>Keith Stelling stated in "SUMMARY OF RECENT RESEARCH ON ADVERSE HEALTH EFFECTS OF WIND TURBINES" that</p> <p>"It appears that animals are even more susceptible to low frequency noise than humans. The animal kingdom relies upon a wide range of sound frequencies inaudible to humans. It has to be remembered that within these sensitive habitats where almost no background noise is experienced, the low frequency noise and vibration projected (and transmitted through the earth) by industrial wind turbine operation is most certainly threatening or confusing to wildlife. The hearing and vibration sensitivity of most creatures in the wild is far more acute than human sound perception.</p>

Commenter	Comment Code	Comment Text
		<p>Confusion by sound emanations can lead to the failure of hunting success, self defense and ultimately survival. Snakes, for example, which rely extensively upon their perception of vibration, are particularly sensitive to habitat disturbance from industrial developments. The noise pollution at higher frequencies may explain the catastrophic effect wind turbines are having on bats, a significant keystone species within the balance of nature. Permeating a large area of natural habitat with extraneous noise pollution will have obvious repercussions for the survival of species dependent on the special characteristics of these unique refuges and, as has been observed by biologists, lead to permanent abandonment."</p> <p>"Scientists have concluded that wind turbine developments placed near important wildlife areas have a long term. irreversible destructive effect upon these habitats. The effect is cumulative, and increases the longer the wind turbines remain in place." (Stelling & Phyt, 2009)</p> <p>The Lava Ridge Wind Project will permanently damage our unique desert ecosystem forever. Future generations will never see this land as a breathtaking area abounding with diversity and natural beauty but instead as a wasteland full of red blinking lights, an empty shell void of life.</p>
Hidden Valley Organic Dairy Farm	WILD01 - 1 - General/Other	<p>For this project, 380 miles of roads will have to be constructed from turbine to turbine, as well as trenching that must be done to bury miles and miles of underground cables. Each turbine has a concrete base that goes about 15 feet into the ground. In the project it has also been proposed that the area be used for the decommissioning of windmills as well. The most common practice of decommissioning windmills is to dig a hole and bury the old wind turbine parts. All of this digging and trenching will displace many burrowing animals. Foxes, badgers, skunks, burrowing owls, burrowing toads, sage grouse, and many other animals' habitats will be destroyed. Many of these animal populations have already been on the decline and will suffer greatly from the increased traffic as well as the noise disruptions.</p> <p>The addition of a windfarm to our area would be detrimental to the health of every living thing that calls our area home. Animals have refined senses and therefore will be extremely affected by this project. However, even humans will experience adverse side effects to the industrial wind turbines. The unfavorable influence that the Lava Ridge Wind Project will have is destructive and irreversible.</p>
Individual	WILD01 - 1 - General/Other	Some concerns I have include the impacts on bats, eagles, songbirds, mule deer and the pronghorn migration. Please study the effects in depth to these species.
BlueRibbon Coalition	WILD01 - 1 - General/Other	Wildlife viewing is an essential part of outdoor recreation and wind turbines have a known history of disrupting wildlife populations.
BlueRibbon Coalition	WILD01 - 1 - General/Other	We are concerned how the Lava Ridge Wind Project will affect current wildlife. There has not been proper research done how the proposed heavy equipment, site clearing, grading and blasting will affect wildlife. The public cannot make informed comments because Magic Valley, LLC has not yet conducted an environmental study plan. The BLM also needs to provide and use best available science.
Individual	WILD01 - 1 - General/Other	Negative impacts on wildlife and the environment. The high desert is home to many plant and animal species. Many migratory birds such as waterfowl and golden eagles use this area as a migration route and would be greatly affected by the wind turbines. Habitat for sensitive bird species such as the near threatened Greater Sage Grouse would be destroyed if such a project was approved.
Individual	WILD01 - 1 - General/Other	Humans must provide safe corridors for wildlife and plant life to migrate through to sustain biological diversity.
Individual	WILD01 - 1 - General/Other	This land may seem simply to be a desert but it is home to plants that are being encroached upon in the surrounding areas, home to the nearly extinct Sage-grouse, home to ungulates from Blaine County and the surrounding areas, and much more. With the expansive amount of land to be used between roads, substations, and so on--these animals and plants will continue to face challenges that they may never rebound from. Renewable energy is pertinent but not at the expense of habitats and ecosystems that are already being devastated by growth and development. We have seen what renewable energy has done to our salmon populations along the Columbia River, which has cost close to \$17 billion in failed recovery efforts. The sage-grouse lets us know how habitats are doing and with their current numbers, they are evidence that such habitats and ecosystems are literally dying. So build this windfarm but these animals, plants, and entire ecosystems will not be forgotten and in 30 or 40 years billions will be spent on recovering lost species and habitats--just as is being done on the Columbia River at this time and for the past 40 years. And this is just talking about the land use, what about the air use? Many avian species use this area as a migration corridor--animals that are pertinent for many ecosystems in the North American and Mexican west. I believe that this project should be relocated and should not be built at the expense of so much wildlife and ecosystems.
Individual	WILD01 - 1 - General/Other	Wildlife WILL BE adversely affected, from insects, reptiles, antelope, deer and elk. This can be sorely minimized, but this is the State we live in and this is a very important resource for Idahoans.
Idaho Conservation League	WILD01 - 1 - General/Other	We are concerned about how the current proposed action may negatively impact local wildlife populations and their habitat. We are hopeful that, with additional wildlife survey data and project refinements, impacts to most wildlife resources can be avoided, minimized and mitigated.
Idaho Conservation League	WILD01 - 1 - General/Other	Despite this area being previously impacted to various degrees by habitat degradation and fragmentation, that there are still a number of wildlife species present in the project area that could be adversely affected, including a small population of sage-grouse (mentioned below), sagebrush steppe obligate species such as pygmy rabbit, sage thrasher, sage sparrow as well as pronghorn and mule deer (mentioned in the big game section below). The BLM should map out any remaining high quality sagebrush habitat and design the project to avoid these areas and focus development corridors and construction yards to previously disturbed or ecologically diminished areas.
Idaho Conservation League	WILD01 - 1 - General/Other	Insects have been found to have fatal interactions with wind turbines, often facing fatal collisions with turbine blades. While there are few studies that have been able to determine the exact impact of this energy infrastructure on pollinating insects, it appears that swarming and migrating arthropods are often killed by turbines. Declines in insect populations can lead to a significant decline in the ecosystem services provided by these species, especially pollination services. We recommend that BLM and Magic Valley Energy/LS Power survey the local pollinator species and determine their risk of decline from the construction of Lava Ridge. Especially with agriculture as the dominant land use, maintenance of healthy pollinator populations is important for the environmental and economic health of the area. There are a number of mitigation measures that can be undertaken to improve pollinator habitat and pollinators in the broader area and we encourage Magic Valley Energy/LS Power to explore these options. We note that simply improving habitat for pollinators or other types of wildlife within the project area may not be the best mitigation measure if these species may be harmed by turbine operations.
Idaho Conservation League	WILD01 - 1 - General/Other	Magic Valley Energy/LS Power must develop and implement a comprehensive wildlife monitoring plan to assess the loss of habitat services resulting from construction and operational activities. It may be that the DEIS accurately predicted the extent of any impacts and, if so, that is extremely useful information for other projects. If the monitoring finds that the EIS overestimated or underestimated impacts to certain species, this is also extremely important information for other projects. Wildlife monitoring and evaluation should include assessments of individuals, populations, communities, and ecosystems. The monitoring and evaluation plan should include objectives for wildlife and habitat health, a schedule for monitoring and reporting, parameters to measure whether the impacts are within the range of the environmental analysis. We also recommend developing population and habitat triggers for key wildlife species and a set of predetermined actions if triggers are tripped. If the adverse population or habitat effects are more significant than anticipated and triggers are tripped, the BLM should require a set of additional, pre-set actions that include additional monitoring, avoidance, minimization and mitigation measures. These metrics, triggers and responsive measures should be outlined in the DEIS.
Idaho Conservation League	WILD01 - 1 - General/Other	The BLM should analyze the effects to wildlife from adding such significant road density to this area. This increased road density has the potential to compromise the project area's ability to support wildlife by increasing the potential for disturbance by humans, fragmenting habitat, promoting sedimentation, and encouraging illegal OHV use.
Idaho Conservation League	WILD01 - 1 - General/Other	Potentially affected reptiles and amphibians include sagebrush short horned lizards, desert horned lizards, western rattlesnakes, western toads, and northern leopard frogs. Loss of sagebrush, compaction of soils, and destruction of ground burrows from construction of the Lava Ridge project could result in declining populations of native reptiles in the project area. Alteration of the landscape for turbine construction could reduce moist locations that are essential for amphibian survival. The BLM and Magic Valley Energy/LS Power should obtain accurate population estimates for resident reptiles and amphibians, avoid high quality habitat, and mitigate any negative impacts to affected species.
Idaho Conservation League	WILD01 - 1 - General/Other	<p>Monitoring wildlife impacts</p> <p>Magic Valley Energy/LS Power must develop and implement a comprehensive wildlife monitoring plan to assess the loss of habitat services resulting from construction and operational activities. It may be that the DEIS accurately predicted the extent of any impacts and, if so, that is extremely useful information for other projects. If the monitoring finds that the EIS overestimated or underestimated impacts to certain species, this is also extremely important information for other projects. Wildlife monitoring and evaluation should include assessments of individuals, populations, communities, and ecosystems. The monitoring and evaluation plan should include objectives for wildlife and habitat health, a schedule for monitoring and reporting, parameters to measure whether the impacts are within the range of the environmental analysis. We also recommend developing population and habitat triggers for key wildlife species and a set of predetermined actions if triggers are tripped. If the adverse population or habitat effects are more significant than anticipated and triggers are tripped, the BLM should require a set of additional, pre-set actions that include additional monitoring, avoidance, minimization and mitigation measures. These metrics, triggers and responsive measures should be outlined in the DEIS.</p>
Individual	WILD01 - 1 - General/Other	Having participated in one of your Zoom sessions, I am convinced that this project would be very harmful to a great portion of the bird and mammal population in that area. No adequate answers to this were offered by your department - other than EIS were being done. You already know this project can't be done without significant harm.
Individual	WILD01 - 1 - General/Other	I am against the project I do not believe the cost justifies the electricity that were going to get it seems like it hurts thousands of birds other countries have scrapped it like Germany because of the cost and the return I think there are other environmental impacts animal habitat is ruined I am also scared away and the project is just too extensive
Individual	WILD01 - 1 - General/Other	Wind turbines are also well known to kill other wildlife, including bats.
Theodore Roosevelt Conservation Partnership	WILD01 - 1 - General/Other	Because we need more data about long-term impacts of wind development on a variety of wildlife, the TRCP is concerned a rush to develop and bring renewable energy resources to the market could negatively impact fish and wildlife and result in a loss of access for hunters and anglers.

Commenter	Comment Code	Comment Text
Individual	WILD01 - 1 - General/Other	Direct and indirect impacts in this large area would destroy, degrade and fragment the previously undeveloped desert habitat and effectively sever connections between it and other unique landscapes and habitats in the region (i.e., sagebrush steppe, lava flows of Craters of the Moon, lava tube caves, irrigated agricultural fields, ephemeral ponds and water impoundments, canal systems, Snake River). Because the proposed project is so large, it may be difficult for some species to find suitable replacement lands to support necessary foraging territories and migration pathways.
Individual	WILD01 - 1 - General/Other	The proposed Lava Ridge Wind Project may impact wildlife through direct mortality due to collisions with turbines, power lines, meteorological towers, and vehicles, displacement from preferred feeding, resting, or roosting/nesting areas, and alteration of migratory pathways. Mortality, displacement, and habitat degradation, fragmentation, and loss must be addressed for cave-roosting bats, migratory bats, migratory birds, raptors, sage grouse, big game, small mammals, amphibians and reptiles in the EIS.
Coalition to Protect America's National Parks	WILD01 - 1 - General/Other	There is some uncertainty regarding the potential effects on wildlife species and their habitats in and around the project area because baseline studies are incomplete and insufficient to verify species presence/absence or distributions. However, spillover effects from proposed wind industry operations are of notable concern because of close proximity to Minidoka NHS and Craters of the Moon NMP; and because wildlife species likely travel through or feed within park boundaries.
Coalition to Protect America's National Parks	WILD01 - 1 - General/Other	In general, the DEIS should analyze potential impacts of the proposed action and other action alternatives on affected wildlife species, including bird and bats; and potential impacts to native plant species, including plants within the ecologically unique areas known as kipukas. We encourage BLM to also identify and include appropriate mitigation measures and monitoring requirements related to species protection within each of the action alternatives considered.
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	WILD01 - 1 - General/Other	<p>VI. Unnecessary fences should be identified and removed. Where deemed critical, fence design, location, and construction should be done in a wildlife-friendly manner.</p> <p>Where fences are deemed critical within the proposed project area , the BLM should require fences associated with the project to be constructed using wildlife-friendly fence designs, with special design consideration towards pronghorn, mule deer, sage-grouse, and other bird species. Fences can cause direct impacts (injury or mortality from fence collision) or indirect effects (create unintended hazards and barriers for wildlife, from big game to birds, blocking daily wildlife movements, seasonal migrations, and access to forage and water) 51. Avian Species of Greatest Conservation Need that are more vulnerable to fence collision and entanglement include Greater Sage-grouse, Ferruginous Hawk, Golden Eagle, Burrowing Owl, and Short-Eared Owl52. Big game species that are most well-known for their challenges with fences are mule deer, pronghorn and elk.</p> <p>Siting and designing fence structures to be wildlife-friendly has been proven to reduce negative interactions for wildlife species. Fences pose particular collision hazards to Greater Sage-Grouse when located <2 km from known leks, where fence segments lack wooden fence posts, and where fence segments exceed 4 m (13.1 ft)53. Research on sage-grouse has shown that fence markers can reduce fence collisions by 70% to more than 80%54. Wildlife-friendly fences can also be constructed to be compatible with livestock needs. To mitigate the impacts of newly constructed fences, unnecessary fences (or other structures) within or adjacent to the project area should be identified and removed. This proactive effort will help minimize the risks on the landscape to birds and big game.</p>
Shoshone-Bannock Tribes	WILD01 - 1 - General/Other	The Tribes are requesting the environmental analysis include migratory and resident evaluations for all species of big game, birds, and small mammals be conducted for the APE. Some of the specific concerns include disturbance for wintering big game animals in the APE, impacts to candidate species like Sage Grouse, and migratory bats. The expansive nature of the proposal includes a landscape level modification that require a commensurate level of evaluation for impacted species to fulfill the adequacy requirements of the NEPA process.
Individual	WILD02 - 2 - Big Game	The roads will also provide Hunters with easy access to the wildlife in the area and will make it harder for the animals to survive. and it will take away approximately. 10,000 acres of there grazing ground.
Individual	WILD02 - 2 - Big Game	the BLM land where this is projected is vital habitat for wintering elk and deer.
Idaho Chapter of Safari Club International	WILD02 - 2 - Big Game	Note that we oppose this project, due to the adverse effects on wildlife, especially migrating pronghorn
Idaho Chapter of Safari Club International	WILD02 - 2 - Big Game	The area proposed for the Lava Ridge project lies within traditional pronghorn migration routes. The installation of wind turbines will require new, permanently maintained roads and pad sites, which will permanently increase human traffic along these routes. It is well known that increased road traffic reduces habitat use by wildlife and unfortunately also provides access for those with a tendency to illegally harass wildlife. This project can only have a detrimental effect on migrating pronghorn, not to mention other important species including sage grouse and pygmy rabbits. We believe it is inappropriate for the BLM to advance projects contrary to the goal of Secretarial Order No. 3362 of the DOI, especially at a time in Idaho history when public and private lands are facing such rapid development pressure. Wildlife habitat is disappearing at an accelerating rate and we prefer that BLM not add to the problem.
Idaho Chapter of Safari Club International	WILD02 - 2 - Big Game	The Idaho Chapter of SCI raises money from private sources for wildlife research and management, including recent funding to map pronghorn migration routes in Idaho. We represent approximately 200 Idaho citizens who do not want to see wildlife habitat lost to federally-subsidized projects of dubious necessity. We respectfully request that BLM not move forward with the Lava Ridge project.
Individual	WILD02 - 2 - Big Game	I am concerned about the wind project affecting sage hen habitat and also migrating Deer and elk during winter months. The wildlife use this corridor during heavy snowfall years to get further south to the snake river canyon . All this activity with blasting holes in lava rock big enough to put 100 truckloads of concrete for 1 windmill will be devastating for wildlife not to mention what it could do to the fragile aquifer in displacing current pathways of present waterways with the large concussions of multiple blast.
Idaho Office of Energy and Mineral Resources	WILD02 - 2 - Big Game	<p>The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project.</p> <p>Big Game</p> <ul style="list-style-type: none"> - Degradation, fragmentation, and loss of winter range and subsequent big game survival consequences. - Disturbance and displacement from preferred habitats. - Disruption of migration/movement routes and habitat connectivity. - Mortality sources from Project infrastructure, vehicles, etc. - Measures to avoid and minimize adverse effects.
Magic Valley ATV Riders	WILD02 - 2 - Big Game	The abundance of wildlife both big game and predatory animals is a great draw to this area by persons wishing to view the animals and during hunting season. Big game animals use this area as wintering range with some remaining year round.
Individual	WILD02 - 2 - Big Game	In the winter deer, elk and antelope migrate to that area. How much more stress will this activity and ongoing maintenance have on these and other wildlife?
Individual	WILD02 - 2 - Big Game	As Idaho Fish and Game will verify, this area is a wintering ground for big game animals. And there wintering habitat is already a shrinking area.
Individual	WILD02 - 2 - Big Game	This is a huge corridor for natural migration of big game animals, migratory birds, bat caves and nesting sites for grouse. This development will have a huge negative impact on their well-being and survival.
The Nature Conservancy	WILD02 - 2 - Big Game	Habitat and migration impacts to big game populations. Results from ongoing research by Idaho Department of Fish and Game (IDFG) about migratory pronghorn and mule deer in the area should be considered (IDFG 2021d). Better understanding of habitat use and movement patterns of wildlife can be used to avoid, minimize or mitigate negative impacts on regional populations.
Idaho Conservation League	WILD02 - 2 - Big Game	<p>Pronghorn, mule deer and elk utilize the project area, particularly during winter months. See attached report, Figure 2 (Attachment 2). A population study of mule deer and pronghorn in Blaine County - and unrelated to any Lava Ridge studies - revealed a previously unknown migration path through the Lava Ridge project site. The Idaho Department of Fish and Game is calling this apparent route the Owinza Pronghorn Migration. Because only a handful of animals were collared for this unrelated study, the preliminary findings are insufficient for the purposes of taking a hard look at the potential impacts of this project. Only seven pronghorn were monitored and too few mule deer were collared for statistically significant mapping. The Idaho Department of Fish and Game hopes to conduct a more comprehensive study in the Lava Ridge area to get a better understanding of how big game utilize this area. We recommend that Magic Valley Energy/LS Power coordinate with the Idaho Department of Fish and Game to make sure a sufficient number of individuals of each species is collared this winter.</p> <p>It is unclear as of scoping what kind of separate quantitative studies Magic Valley Energy/LS Power has conducted. We recommend that Magic Valley Energy/LS Power provide meaningful assistance to the upcoming Fish and Game study as their project depends on having high quality data from which to make informed decisions. The study should be conducted throughout this winter and continue into the next winter to gain a better understanding of how big game utilize this area. It is not sufficient to simply collect data within the project area. For effective off-site mitigation measures, it is important to understand the population dynamics, core habitat areas, migratory corridors and limiting factors in the surrounding area so that off-site mitigation measures can be tailored to the identified limiting factors.</p>

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Idaho Conservation League	WILD02 - 2 - Big Game	<p>Based on the study’s preliminary findings, it appears that there is a north-south big game corridor in the project area. We understand that Magic Valley Energy/LS Power has some degree of flexibility regarding the location of individual turbines and wind strings. As an avoidance measure, we recommend developing an alternative that relocates the turbines within this wildlife corridor to another string. The exact distance or buffer from the remaining turbines to the wildlife core area and corridor should be based on the best available science.</p> <p>In 2017, Sawyer et al. found that mule deer will avoid energy infrastructure for at least 15 years post-construction. This long-term impact to behavior could have major implications for mitigation and management of this game species in the study area. The results of Sawyer and others emphasize the importance of proper data collection for how this area is used by these species.</p> <p>Taylor et al. 2015 found that winter survival of pronghorn was not was influenced by exposure to small-scale wind infrastructure near Dunlap Ranch in Wyoming; however, Sawyer et al. 2019 found that long-term pronghorn response to industrial-scale energy development can involve both avoidance of infrastructure and partial abandonment of traditional winter ranges.</p>
Idaho Conservation League	WILD02 - 2 - Big Game	<p>Regarding pronghorn and mule deer mitigation, there are several significant migratory corridors in the region such as between Craters of the Moon and the mountain valleys. Some of these have geographic pinch points made more problematic by fences that do not allow for easy wildlife passage. Here is a relevant summary of the pronghorn migration from Craters of the Moon National Monument:</p> <p>This migration extends over one hundred miles each way from the Pioneer Mountains to the Birch Creek area of the Upper Snake River Plain. The migration route parallels Highway 20/26/93 for most of the stretch between the towns of Carey and Arco. It passes through a narrow corridor in places only a few hundred yards wide between the Craters of the Moon lava fields and the foothills of the Pioneer Mountains. Many more modern obstacles have appeared within the migration corridor over the past century. Fences and highways both present real challenges and dangers to pronghorn attempting to cross them. For all their athletic speed, pronghorn do not like to jump. When encountering a barbed wire fence they attempt to crawl underneath rather than going over. Some fences with wire too close to the ground prevent this option and pronghorn must search for a way around. Fences along highways present particular danger to pronghorn attempting to cross roads along the migration corridor. They are often either struck by vehicles or run head long into barb wire when panicked by oncoming traffic.</p> <p>The National Park Service, along with many other public land agencies and private land owners, are working to reduce fencing hazards by either removing fencing all together or modifying existing fencing to facilitate pronghorn passage. You can help by driving carefully in areas marked as wildlife crossings to reduce wildlife collisions. Slowing down in these zones greatly reduces the risk to wildlife and to you.</p> <p>Much of what is known about the pronghorn migration corridor across Craters of the Moon has only been learned in recent years. Development of new technologies has allowed continuous tracking of pronghorn for a full year. GPS devices with a radio transmitter have been attached to captured pronghorn. After a year the devices are programmed to fall off and can then be located using the radio transmitters. The recorded locations from the GPS device are downloaded to reveal an almost hour-by-hour record of their movements. A number of organizations led by the Lava Lake Institute for Science and Conservation and the Wildlife Conservation Society made this study possible.</p> <p>We recommend that Magic Valley Energy/LS Power help support these adjacent research efforts. We also recommend that Magic Valley Energy/LS Power develop a pronghorn mitigation program focused on identifying and prioritizing these pinch points and work with willing landowners and permittees to modify, upgrade, replace or remove fences of concern.</p>
Idaho Conservation League	WILD02 - 2 - Big Game	<p>We are also concerned about how big game patterns may be influenced by snow depth within the project area and recommend that the BLM and Magic Valley Energy/LS Power consider how wildlife movement may change during high snow years. Some important overwintering habitat for both big game and sage-grouse may not be apparent until high snow events. These overwintering areas or winter refuges may be marked by landforms with southern exposures where bitterbrush and other forage is more readily accessible. Snow plowing activities during project construction and operation may also alter big game movement through the area. Big game often travel on plowed roads during periods of deep snow and plowed snow banks may make it harder for them to leave the road. As a result, big game may be more vulnerable to vehicle collisions. There may be ways to reduce adverse effects by reducing vehicle speeds in certain areas or incorporating ramps into snow plowing activities.</p>
Theodore Roosevelt Conservation Partnership	WILD02 - 2 - Big Game	<p>A project near a pronghorn migration corridor may be just as devastating as a coal mine or natural gas field, but we additional research to address that concern. Access roads, fencing, and transmission lines associated with renewable projects could all have negative impacts on wildlife, as well</p>
Theodore Roosevelt Conservation Partnership	WILD02 - 2 - Big Game	<p>I. The EIS must document and analyze effects of the proposed project in its entirety on big game species found to use the planning area. The BLM must develop and consider alternatives that minimize or avoid negative impacts on these species.</p> <p>Deer, elk, and pronghorn are culturally and economically important to Idaho s citizens and communities. These big game species travel upwards of 100 miles to reach favorable summer and winter ranges. Large, intact, and unfragmented habitats are required for big game species to successfully complete this wide range of movement and migration. The project area is utilized by each of these species, and the impacts to their habitat needs must be studied. The BLM should closely consult with the Idaho Department of Fish and Game to incorporate the best available science on where and how big game use the area in and around the proposed project for all stages of their life cycle.</p>
Individual	WILD02 - 2 - Big Game	<p>I Elk hunt that region. I guess that will all go away with those nasty wind turbines going up all over my dessert.</p>
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	WILD02 - 2 - Big Game	<p>I. The EIS must document and analyze effects of the proposed project in its entirety on big game species, considering both construction and operation periods. The BLM must develop and consider alternatives that minimize or avoid negative impacts on these species.</p> <p>Big game are culturally and economically important to Idaho s citizens and communities. Ungulates such as pronghorn, mule deer, and elk travel great distances to reach favorable summer and winter ranges, often traveling upwards of 100 miles. Large, intact, and unfragmented habitats are required in order to successfully complete this wide range of movement and migration. The Lava Ridge project area overlays general and winter habitat for these species. Impacts to these species and the landscapes utilized by these species at critical times must be analyzed and made available for public comment/understanding during this review process, not only in regards to project construction but also during operation.</p> <p>Habitat loss and fragmentation are among the most influential factors affecting species distribution and population viability3. Worldwide, energy development projects are quickly converting native habitats into roads, well pads, pipelines, wind turbines, solar installations and other infrastructure associated with energy production4. Research assessing the impacts of energy development to ungulate populations has focused largely on impacts of oil and natural gas, which has found responses to include avoidance and altered movement patterns5.</p> <p>It remains largely unknown whether impacts to ungulates in general, and pronghorn in particular, associated with oil and gas development are comparable with other forms of development6. However, both wind energy and oil and gas development result in increased human activity during construction and production phases. Traditional energy generation and wind energy developments have similar infrastructure densities and direct habitat loss per unit area, yet the potential impacts to ungulate behavior in response to wind infrastructure remains unclear7.</p> <p>There also seems be a perception that ungulates adapt to altered landscapes and acclimate to energy infrastructure. National Environmental Policy Act (NEPA) assessments often assume displacement of ungulates is short term, and once the production phase is initiated, behavioral impacts attenuate or cease8. However, in one study in western Wyoming, mule deer did not habituate to disturbance and continued to avoid energy infrastructure after fifteen years of development9. In the study, mule deer abundance declined by 36% during the development period, despite aggressive onsite mitigation efforts and a 45% reduction in deer harvest. Similarly, studies of mule deer and elk in Oregon suggest that habitat selection and movements may be altered by roads, primarily because of the associated human activities10. Long-term avoidance behavior in historic winter range is problematic because indirect habitat loss reduces the size of winter range available for mule deer-habitat that would otherwise be used is functionally unavailable11. Important mule deer winter range includes areas that reduces the rate of energy loss by providing shallow snow, adequate food resources, security cover, and thermal environments12. Winter survival primarily depends on accumulating body reserves prior to winter and selecting landscapes that provide adequate forage and protection from weather and predators13. Winter range is often geographically restricted, so that habitat loss cannot be offset by simple range expansion. Thus, when habitat is lost directly through conversion to infrastructure and additionally through behavioral avoidance, carrying capacity is also reduced14.</p> <p>As interest in wind development has increased in sagebrush country, so has interest in understanding potential impacts to pronghorn. Taylor et al. (2016) found that proximity to a wind facility did not affect winter survival of pronghorn, but it did change patterns of space use by females15. This latter piece is important given that populations are driven by females and their ability to reproduce sufficient young at or above replacement levels. Thus, special consideration must be given when contemplating further development to landscapes used by pronghorn during winter as they are already predisposed to high mortality rates on winter range due to harsh environmental conditions and high energy demands16. Exposure to further disturbance during this already risky timeframe such as being pushed to use of lower quality habitat - may impact survival and overall health of these populations17.</p> <p>The health of Southern Idaho s ungulate herds relies on the conservation of sagebrush integrity and the connectivity to winter range. Secretarial Order 3362 Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors directs the Department of Interior, in partnership with the state of Idaho, to improve the quality of big-game winter range and migration corridor habitat.</p> <p>We encourage the BLM, in coordination with Idaho Department of Fish & Game (IDFG) to analyze wildlife movement and migrations that occur within and adjacent to the project area, and produce comprehensive maps on these findings to be included in the project record. If these findings indicate an overlap of the project area in functionally available winter range, alternatives that minimize impacts to these areas or avoid them altogether must be developed and considered. This information gap is necessary to close for a decision that minimizes impacts to our states cherished ungulate species and is supported by the best available science.</p>
Prairie Falcon Audubon	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>All forms of energy, including wind power, have impacts on birds. Our role as a regional stakeholder is to make sure that key species and high conservation areas for birds are protected as much as possible and in accordance with federal law.</p> <p>The risk of a bird collision with wind turbines/transmission lines is influenced based on turbine/transmission line placement, turbine design, and how birds move across the landscape. This is deemed a critical element in reducing bird/wind power collision risk. Over 200 species of bird have been documented as killed by collision with wind turbines. Passerines are most reported, followed by raptors that hunt by day such as hawks, eagles and falcons.</p> <p>Habitat impacts are also a major concern with wind energy facilities as they are often large developments that, if improperly placed, may cause a loss or fragmentation of habitat that species frequently use or depend on for survival. Knowing where certain birds are and when, and siting facilities to avoid high movement or occurrence areas can make a big difference in avoiding and reducing bird impacts. Specifically, the prospect of a Greater Sage-Grouse Endangered Species Act listing has brought attention to the condition of</p>

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		<p>the sage-steppe system. This iconic birds habitat has been fragmented by development of sagebrush environments and there has been a considerable loss of suitable sagebrush habitat to support the birds life history, including its needs for food, cover and nesting space. Federal land managers must take bold steps to successfully manage the sage-steppe ecosystem for it to remain a vibrant and functional landscape.</p> <p>Prairie Falcon Audubon members participate in numerous citizen science projects in and around the proposed Lava Ridge Project footprint which includes Greater Sage- Grouse lek surveys and winter raptor surveys. Wilson Reservoir is considered a birding hotspot throughout the state of Idaho during the winter months. This small body of water provides a resting spot for Common and Pacific Loons, Trumpeter Swans, Surf Scoters, and a plethora of waterfowl and shorebirds. As the waters recede during the winter, large numbers of Bald Eagles are observed feeding on carp. Bird species diversity is the jewel in this area.</p> <p>Please consider the following requests and recommendations:</p> <p>Request wind energy project location, design, operation, and lighting should be carefully evaluated to prevent bird mortality.</p> <p>Request that thorough, seasonal surveys be performed for sensitive species and a full disclosure of survey methods and results be provided to the public and other agencies to allow for analysis for proper siting and avoidance of these sensitive areas.</p> <p>Recommend that a cumulative effects analysis must encompass the full range of habitat for potentially affected species (e.g., breeding grounds, migration route, wintering areas, and total range of affected populations).</p> <p>Demonstrate that federal agencies will enforce provisions of the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and the Endangered Species Act once the project is in place.</p>
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	As a biologist i am opposed to this entire project. I have been doing raptor surveys for the last 7 years and i know these windmills are raptor killers. The amount of land disturbed for all the construction reduce the prey habitat. I don't think windmills are economically viable without subsidies. There are many other negative factors as well, but i am totally opposed. By the way, i own a hydroelectric power plant which is truly green energy. At least ours has essentially no impact on anything.
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	Then we have the harm done to the wildlife that will be driven from this area due to the noise pollution too. These huge fans kill birds, even protected birds, that the rest of us would be fined for.
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	Hunting and wildlife issues are very important to me. The BLM must analyze the project's impact on: How will this effect birds traveling through the area especially long distance migration routes and protected species like eagles and other raptors. What impact will the turbines have on bats in the area (are there large colonies which use the are that is in question).
Idaho Chapter of Safari Club International	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	Wind energy also has known adverse effects on raptors, song birds and bats.
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	My concern is that eagles, other raptors, migratory bird, and bat species may be harmed by this proposed massive wind energy development. I understand that there are mitigation measures that can greatly reduce this potential mortality. Protecting these species is necessary and consistent with several federal laws and regulations, including the Migratory Bird Treaty Act. For example, I understand that wind turbines or farms can be equipped with radar. When the radar detects flocks of incoming birds or bats, it can automatically shut down the turbines until the danger passes. I urge BLM to support and adopt this and other mitigation measures to provide as much protection as is feasibly possible. Yes, wind energy is urgently needed, but we can walk and chew gum at the same time (we can get the energy while minimizing adverse impacts and avoidable wildlife mortality).
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	I am writing to express my serious concern about the proposed Lava Ridge Wind Project. This project is sited in an area that will have significant impact on Eagles and other raptors as well as bats, and especially Sage Grouse.
Idaho Office of Energy and Mineral Resources	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>The State of Idaho respectfully requests the following items be fully analyzed and given due consideration in the EIS for the proposed Lava Ridge Wind Project.</p> <p>Birds and Bats</p> <p>- Bird and bat populations including behavioral modifications and mortality sources.</p> <p>- Spatial and seasonal measures to avoid and minimize adverse Project effects including for example infrastructure avoidance of roosting and wintering habitats, operational adjustments during peak migration periods, raptor-safe power line designs, downcast facility lighting, etc.</p>
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	13. What are the effects on birds of all types? Death rates etc.?
Western Watersheds Project	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	Meteorological towers with guy wires have been demonstrated to cause avian mortality (e.g., Kerlinger et al. 2012). Whenever possible, meteorological towers should use unguyed designs. If guy wires are unavoidable, marker devices should be installed to make the guy wires more visible to wildlife.
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	What are the bat species potentially present, and what will the impacts be? How will mortalities be detected? What will the take of eagles and other raptors be?
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	1. Threat to flying wildlife (birds and bats)
National Park Service	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	Bald and Golden Eagles, migratory songbirds, and bats migrate substantial distances across multiple states. The project area is considered a Key Habitat Area for Bald Eagles by the American Bird Conservancy. Collision with wind turbine blades and transmission lines are a known source of mortality for flying animals. The many hundreds of caves at Craters of the Moon NM&P provide important habitat for bats to roost, raise young, and hibernate. Migratory bat species make up the majority of bat fatalities caused by wind energy facilities (Choi, Wittig and Kluever, 2020; Friedenberg and Frick, 2021; Thompson et al 2017).Concern: The NPS is concerned about eagles, songbirds, and bats that are either resident to or that migrate through Craters of the Moon NM&P and use the proposed project footprint area for foraging or migration. More than 100 bird species, including golden eagles (Aquila chrysaetos), have been documented to nest at Craters of the Moon NM&P. Migratory species including hoary bats (Lasiurus cinereus) are known to migrate through the project area. Recommendation: The NPS recommends the applicant complete a desktop study to identify birds and bats that move between the park and the project area and analyze likely mortality and population effects to identified species populations. We also request to provide early input on the Bird and Bat Conservation Strategy and Eagle Management Plan.
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>I have a similar concern for the dwindling bat numbers in the Magic Valley.</p> <p>Vulture numbers in this area are stable at this time; however what impact would this project have on the existing population? Vultures will be attracted to birds killed by wind turbines and become losses as well. What is an acceptable impact to the vulture population?</p>
Hidden Valley Organic Dairy Farm	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>The category of wildlife that would be the most adversely affected are birds. The area where the proposed wind project will be installed is home to the sage grouse and even occasionally bald eagles. On December 22, 2019, this photo was taken at 1375 W Hwy 24 Paul, Idaho at the home of Aaron and Des Telford, only 7 miles from the future turbines as the crow flies (or as the eagle flies).</p> <p>With the installation of these industrial wind turbines, our area will no longer be habitable for these majestic creatures.</p>
BlueRibbon Coalition	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	BLM should use best available science regarding flight paths of migratory birds and analyze how the wind turbines will affect those paths.
American Bird Conservancy	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	The sheer scale of the proposed project and its location in an area of importance for birds mandates that comprehensive field studies be conducted to inform wind turbine siting. This is further reinforced by the proposed location on public land this demands a high standard for adherence to the mitigation hierarchy. Clean energy projects on public lands should not contribute to the continuing decline of our nations birds.
American Bird Conservancy	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>ABCs wind risk assessment map5 shows three areas of importance for birds in the vicinity of the project site: (1) the entirety of the site is mapped as an area of importance for eagles; (2) an intermountain raptor migration corridor is mapped in a generally northwest-southeast oriented band southwest of the proposed project site; and (3) a Greater Sage-grouse breeding stronghold is mapped to the northeast.</p> <p>The above indicates that planning for Lava Ridge Wind must take particular care to study and assess, then avoid, minimize, and mitigate impacts to raptors and Greater Sage-grouse.</p>
American Bird Conservancy	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>Due to their flight behavior and relatively slow rate of reproduction, many raptor species are vulnerable to fatal collisions with wind turbines. At one wind energy facility in California, Golden Eagle populations were only maintained by continental scale migration, i.e., mortality caused by collisions with wind turbines was only offset by drawing in additional birds at a massive scale.</p> <p>A more recent study found that five species Golden Eagle, Ferruginous Hawk, American Kestrel, Barn Owl, and Red-tailed Hawk are at risk of population-level declines specifically as a result of wind energy development.1 Among these, two species of conservation concern are likely to be present on the Lava Ridge site: Golden Eagle and Ferruginous Hawk.</p>

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		<p>The Plan of Development (POD) for the proposed project indicates that eagle/raptor nest surveys will be conducted. Given the known risk that wind turbines pose to raptors, and the importance of this area for these species, this level of survey effort is grossly insufficient to inform risk assessment in an EIS.</p> <p>Nest surveys do not effectively evaluate raptor collision risk during the critically important spring and fall migration periods, during winter months, or during post-breeding dispersal, when nave juvenile birds enter the population. Birds are present in different numbers, behave differently, and are vulnerable to collisions with wind turbines in all of these periods.</p> <p>The POD does not specify the number of years of surveys that will be conducted. It is important that multiple years of raptor studies be conducted to account for inter-annual variation in distribution and abundance of raptors, and the generally low densities of these birds. We note that the U.S. Fish and Wildlife Service (FWS) recommends two years of surveys to inform wind facility planning.⁶</p> <p>Recommendations</p> <p>1.Raptor surveys should be conducted on the site and vicinity to the following specifications:</p> <p>Two full years of surveys, during all months to encompass all aspects of the annual life cycle;</p> <p>Data should include behavior and altitude for birds in flight, as feasible;</p> <p>Surveys must satisfy recommendations provided by FWS for eagles; and</p> <p>In the EIS, associated data should be presented in a way that allows for public understanding of the correlation among count data, time of year, sampling spatial layout, and bird behavior.</p> <p>2.If concentrations of raptors, and particularly eagles or Ferruginous Hawks, are discovered in surveys, turbines in the vicinity should be removed from the plan or relocated to avoid collisions.</p> <p>3.Compensatory mitigation should be provided to a net conservation benefit for impacts to raptors through on-the-ground conservation actions to offset losses.</p>
American Bird Conservancy	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>The POD indicates that fixed-point avian use surveys will be conducted as part of pre-construction studies. The details for this study are unclear.</p> <p>Recommendations</p> <p>1.Avian surveys should be conducted for a minimum of two years using appropriate methodologies, and in all months to evaluate bird presence and abundance throughout the annual life cycle.</p> <p>2.If significant concentrations of birds are found, turbines and other infrastructure should be relocated or removed from the plan in these areas.</p> <p>3.If species of conservation concern are located that are vulnerable to collisions with turbines or displacement by facility construction, turbines and other infrastructure should be relocated or removed from the plan in the areas where they are found.</p> <p>Compensatory Mitigation Must Be Provided for Impacts to Birds</p> <p>Compensatory mitigation should be provided to a net conservation benefit for habitat loss and predicted take via collision for all native bird species, including but not limited to those specifically discussed in the sections above. Birds are a public trust, and this project is proposed to be constructed on public land this project must make every effort to compensate impacts.</p>
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>I have a concern about the proposed Lava Ridge Wind Energy project, namely the potential to severe injury and mortality to songbirds, especially migrating songbirds; gamebirds; raptors; and bats. The injury and mortality would be due to collision with the windmill blades. These insults have been reported in existing wind projects, most of which have been much smaller than the project in question. If the project is allowed to proceed, I would advocate it done in stages with time for evaluation of above stated injury and mortality in the first stage before the next stage is allowed, and then a second evaluation before the third stage is sanctioned. These evaluations should be performed by federal agencies or by contractors under close monitoring by federal agencies. This oversight is a concern for me due to the experiences of a family member working for an environmental contractor at a wind farm whose observations (my relative's) were suppressed for fear they would be unfavorable to the entity hiring the contractor.</p> <p>Studies indicated that most bird and bat species have suffered huge decreases in individuals over the past thirty years. Severe increases in mortality such as could be caused by a wind energy project as large as Lava Ridge's could throw them over the brink of recovery.</p>
U.S. Environmental Protection Agency	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>The proposed project will be constructed in an area where other projects have, are, or will occur in foreseeable future and may have potential effects to resources therein, such as migratory bird/bat species. Therefore, EPA recommends the DEIS assesses cumulative impacts of, for example, potential bird/bat mortality that could result from the incremental impact of the Proposed Action and action alternatives when combined with past, present, or reasonably foreseeable activities, including other future wind activities.</p>
The Nature Conservancy	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>Direct impacts to other bird species and bats. Steps should be taken to identify potential impacts to birds and bats, as collision fatalities may result from wind energy production (e.g., Allison et al. 2019c), and explore ways to avoid, minimize or mitigate negative impacts.</p>
Idaho Conservation League	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>The Lava Ridge project should be designed to avoid, minimize and mitigate impacts on raptors either from turbine operations or from accidental electrocution. We appreciate steps that Magic Valley Energy/LS Power has already taken to avoid a golden eagle nest at Crater Butte and a ferruginous hawk nest east of Star Lake.</p> <p>To avoid additional negative effects, turbines and turbine strings should be located outside of major flyways or high use areas by eagles as identified in the NEPA process. Transmission lines should be designed to avoid electrocuting birds of prey. To minimize negative effects, we support the use of radar detection technology, such as the MERLIN Avian Radar System, to turn off the turbines when birds are approaching. We also recommend coordinating with the Intermountain Bird Observatory and building into the system the ability to turn the turbines off for the key nights during the spring and fall migrations. The exact dates of these events will change every year and be related to bird migration timing for that year and weather conditions, but Magic Valley Energy/LS Power can work with IBO and other partners to identify these key nights in advance.</p> <p>To mitigate effects, Magic Valley Energy/LS Power should examine ways to improve habitat for eagles, raptors and migratory birds a sufficient distance from the project area. One potential design feature is to construct artificial platforms for ferruginous hawks and golden eagles in areas where nesting habitat is limited due to lack of cliffs or other structures. Mitigating for effects on raptor populations in offsite locations could also involve enhancing raptor prey populations, and prey populations are best enhanced by managing their habitat. Jackrabbits require shrubs for food and cover; ground squirrels thrive best in vegetation communities dominated by native perennial shrubs and grasses. We also recommend monitoring trends in small mammal populations that are key prey species (ground squirrels and jack rabbits) on a landscape level. The monitoring of small mammals should be coordinated with raptor monitoring.</p>
Idaho Conservation League	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>Ravens are a native and highly adaptable bird species. However, human activities can artificially increase raven populations to the detriment of other native species. Artificially elevated raven populations can have adverse impacts on sage-grouse eggs, nestlings or other sensitive species. Transmission lines have been associated with dramatic increases in raven nesting and landfills and road-killed animals serve as food subsidies for these birds. Avoiding new infrastructure in sensitive wildlife habitat is of critical importance. Designing energy infrastructure to reduce the ability for ravens to nest or perch on structures is also important. There are also ways to mitigate for elevated raven populations by removing the subsidies. Actions may include relocating or redesigning landfills and transfer stations, removing types of infrastructure that are no longer needed such as old fence lines, working with the BLM and permittees to support the swift burial or removal of dead livestock, and working with ITD, Fish and Game and the County Road Maintenance crews on timely removal of trash and roadkill. We do not support the lethal control of ravens as these measures are largely ineffective, unethical and unnecessary if the anthropogenic subsidies are removed.</p>
Idaho Conservation League	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>Bats have been found to be particularly susceptible to death by wind turbines, including collision with turbine towers and rotating blades, as well as barotrauma, which is fatal internal bleeding due to the changes in air pressure. Review studies have found a positive relationship between turbine height and bat fatality, which is of major concern with such tall turbines proposed at the Lava Ridge project. However, studies do show that the aviation lighting on wind turbines may result in fewer bat fatalities. We believe that exploring the use of radar detection technology, such as the MERLIN Avian Radar System, to turn on the night time turbine lights when bats approach is necessary for this project. Furthermore, the ability to turn off the turbine blades as bats approach could decrease the chance of bat-turbine collisions.</p>
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>Avian Species</p> <p>As a property owner located relatively adjacent to the project, and having over two miles of riparian habitat in an otherwise harsh and difficult desert environment, I am concerned about the impacts to avian species, both resident and non-resident migratory birds. In June of 2020, a bird survey conducted on our property identified 41 different bird species, including at least 21 migratory species. Of those 21 migratory species, three protected species of birds of prey were identified. In fact, for the past 8 years, our property has hosted pairs of Golden Eagles that have produced at least one offspring each year. I understand the applicants Bird and Bat Conservation Strategy and Eagle Management Plan is still in development, based on the placeholder with the Plan of Development, Appendix M. Impacts to avian species must be thoroughly analyzed and any proposed mitigation strategies and take permits reviewed with scrutiny.</p>
Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>From personal experience, I know that lava tube caves are common on the Snake River Plain and the locations of two, Wilson Butte Cave and Wind Cave, are shown on Google Maps of the Lava Ridge Wind Project area. Additional lava tubes are probably present and known to BLM and IDFG wildlife officials. Because of the high sensitivity of these unique features to bats, I feel it is important to specifically request that all known or suspected caves in the project area should be surveyed physically and acoustically to determine if bats are using these features for hibernation or stopover roosting habitat during foraging and migration. Both of these uses are common for bats on the Snake River Plain. Year-round acoustic monitoring may be necessary to identify particularly cryptic species like big brown bats and to detect migration pulses.</p>

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Individual	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	Birds - Like bats, birds are also subject to high levels of mortality as a result of wind turbine collisions and the habitat loss, degradation and fragmentation that accompanies large scale wind developments. Raptors, migrating songbirds, and sage grouse are at highest risk. Taller turbines like the 740 ft tall turbines proposed for installation at the proposed Lava Ridge Wind development may increase collision risk for night-flying migrants that concentrate at heights of 300 - 2000 ft., and for grassland species that engage in aerial displays during courtship. Long term impacts are caused by the cumulative footprint of turbines, roads, powerlines, fences, substations, and other supporting infrastructure that causes habitat disturbance, disrupts foraging, breeding and migration, and increased risk of predation.
Coalition to Protect America's National Parks	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>Comment # 9: Studies³⁵ have shown that wind turbines and associated infrastructure can adversely affect wildlife, directly through collisions with turbines and indirectly because of noise pollution, habitat loss, and reduced survival or reproduction.</p> <p>The species groups most likely to be negatively affected in the areas adjacent to the Lava Ridge Wind Farm are birds and bats. Many species of birds and bats migrate seasonally between habitats and along corridors where they are exposed to wind turbines.</p> <p>At Minidoka NHS and Craters of the Moon National Monument and Preserve (NMP) bats have been documented to occur, or are likely to occur as both areas are within the species' known ranges. The most vulnerable bat species are migratory hoary bats (<i>Lasiurus cinereus</i>), which are documented to be killed by wind turbines, and resident Townsends big-eared bats (<i>Corynorhinus townsendii</i>) and little brown bats (<i>Myotis lucifugus</i>). Both resident bat species occur and reproduce in Craters of the Moon NMP, especially in the lava tubes, and likely forage in and around Minidoka.</p> <p>Migratory birds, protected under the Migratory Bird Treaty Act, often migrate along corridors and are attracted to water courses such as occur in and around Minidoka. Golden and Bald eagles are also specifically at risk to collision with wind turbines, and mortalities have been broadly reported. Greater sage- grouse (<i>Centrocercus urophasianus</i>) have been documented in Craters of the Moon and their habitat occurs in both parks.</p>
Idaho Wildlife Federation National Audubon Society Audubon Rockies High Desert Pointing Dog Club Idaho State Bowhunters Prairie Falcon Audubon	WILD03 - 3 - Migratory Birds (incl. raptors) and Bats	<p>III. The EIS must analyze impacts to raptors, notably Ferruginous Hawks and Golden Eagles. Siting should endeavor to avoid areas near nests and key areas of attraction.</p> <p>Golden Eagles and Ferruginous Hawks are both listed as Species of Greatest Conservation Need in the Idaho State Wildlife Action Plan, Tier 2 category meaning they are species with longer-term vulnerabilities or patterns suggesting management intervention is needed³⁴. In addition, Golden Eagles are federally protected under the Bald and Golden Eagle Act (BGEPA), which endeavors to achieve and maintain stable or increasing breeding populations of bald and golden eagles. BGEPA prohibits the take, possession, sale, purchase, barter, offer to sell, purchase or barter, transport, export or import, of any bald or golden eagle, alive or dead, including any part, nest, or egg, unless allowed by permit(16 U.S.C. 668(a); 50 CFR 22). "Take" includes pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb (16 U.S.C. 668c; 50 CFR 22.3).</p> <p>The above should be taken into consideration because both species are a large-ranging avian predators of conservation concern throughout their North American range. Not only are both species in decline, but there is increasing concern due to current and future projections of mortality risk and habitat loss from anthropogenic sources. Among these human-caused sources is collision with wind turbines. In a recent USGS and Oklahoma State University study, 14 raptors were evaluated to determine how they were impacted by collisions with wind turbines³⁵. Of the five with the highest potential for population-level impacts were Golden Eagle and Ferruginous Hawks.</p> <p>Wind development projects can displace raptors from otherwise suitable habitat, and are a significant source of mortality when placed in areas with high raptor concentrations³⁶. Risk increases when paired with some fitness benefit to the individual - such proximity to food resources, roosting, and nest sites. This level of mortality is of particular concern for long-lived vertebrates, such as hawks and eagles, because even a relatively minor increase in adult mortality (3-5%) can lead to significant population declines³⁷.</p> <p>While our organizations look forward to reviewing the avian surveys and associated analyses in the Draft EIS, we do caution that initial review of eBird predicts medium-high median annual abundance for both Golden Eagles and Ferruginous Hawks in the area. In addition, using nest site models developed by Dunk et al. (2019)³⁸, which have direct application to perform risk analyses for wind projects, there is a high golden eagle predicted nest density in the project area and surrounding areas - see Figure 2.</p> <p>The BLM and MVE should proactively identify high risk areas, taking into account topography, and keep turbines and associated infrastructure away from these. Analyses for these far-ranging avian predators should extend beyond the project boundary, and take into account high risk areas in adjacent areas - as these could potentially bring these birds into conflict with turbines. These are key ways to minimize hawk and eagle mortality and displacement. Work in Wyoming, by researchers Tack and Fedy (2015)³⁹ may serve as a valuable model to replicate, as would resources developed by the American Wind Wildlife Institute⁴⁰. And finally, a report was prepared by Olendorff et al. (1989) and published by the Raptor Research Foundation⁴¹. This report, Raptor Habitat Management Under the U.S. Bureau of Land Management Multiple-Use Mandate, describes 223 Key Raptor Areas - areas with unusually high nesting populations, contain important raptor migration points, or where wintering raptors congregate. While dated many raptors continue to use historic nesting/congregation points. This report should be reviewed to determine if there's an overlap of the proposed project (or surrounding area) with KRA #87 and take this information into account to avoid impacts.</p>