

Letter #	Comment #	Entity (AR)	Entity (EA)	Date of Comment	Comment	Response	Section in EA	Comment Topic
1	a	Nicole Meier	Private Citizen	11/4/2022	Articles submitted regarding the socioeconomic impacts of wind farms, including: Chapter 8 of Pace University Wind Energy Guidebook (2011), Property Values and Land-based Utility-Scale Wind Turbines factsheet prepared by American Clean Power Association (2022), "30+ Organizations Urge Congress to Support Robust Transmission Funding in FY 2023 Budget" press release by American Clean Power Association (2022). Comment: This organization is pushing for funding. The report they issued on property values not being affected is bias.	Thank you for the comment and reference material. Socioeconomic effects of wind turbines, including potential impacts to property values, is addressed in Section 3.7 of the Draft EA.	Section 3.7	Socioeconomics
1	b	Nicole Meier	Private Citizen	11/4/2022	Articles submitted regarding the socioeconomic impacts of wind farms, including: "Do Wind Turbines Lower Property Values?" Forbes news article (Sep 23, 2015), and Exhibits to prefilled testimony regarding the New Hampshire Site Evaluation Committee Docket Number 2015-02. Comment: This is just one of many papers from other countries and this country reflecting proof of property value decline spanning decades of wind turbine construction and use. The lawsuits filed and won are proof of lost value. This decline in property value has a multi-generational effect. Socio/economic devaluation is seen in minority groups. Rural is a minority. What do future mitigation strategies look like for the exponential loss of value for our children, grandchildren or great grandchildren? Future generations will still have a planet without wind turbines.	Thank you for the comment and reference material. Socioeconomic effects of wind turbines, including potential impacts to property values, is addressed in Section 3.7 of the Draft EA.	Section 3.7	Socioeconomics
2	a	Campbell County Economic Development	Campbell County Economic Development	11/30/2022	Campbell County Economic Development Corp. (CCED) fully supports the building of the proposed Campbell County Wind Farm II Project (CCWF II). From a pure economic development perspective, it makes good sense to utilize Campbell County's most available natural resource, the wind. The CCWF II will increase county tax revenues, will fiscally support the local schools, and assist in increasing the quality of life for most county residents. Rural South Dakota communities are steadily decreasing in population and local governments need to maintain or increase their tax revenues reasonably.	Thank you for your comment. Socioeconomic effects of the Project is addressed in Section 3.7 of the Draft EA.	Section 3.7	Socioeconomics
2	b	Campbell County Economic Development	Campbell County Economic Development	11/30/2022	Part of the challenge for local governments in meeting the needs for quality-of-life measures, housing and business economics is generating funding without raising taxes too high on residents or businesses. Fortunately, Campbell County government has a revenue stream established and it is going to be around for the next three to four decades at a minimum, which is tax revenue from the Campbell County Wind Farm (CCWF). Capacity and production tax revenue from CCWF has averaged \$316k a year for the past six years. The Pollock – Mobridge School District receives an average of \$158k a year. The Herreid Independent School District is in line for receiving funds from the proposed CCWF II Project, too. For wind turbines built after June 30, 2016, school tax revenue is slotted for five years at 100%, then after five years on a sliding scale of 100%, 80%, 60%, 40%, 20% of tax revenues. Tax revenue from CCWF II will generate an additional estimated \$150k a year. This will be in addition to the average \$316k a year tax revenue being collected now. However, some critics will point to the downside of such tax revenues.	Thank you for your comment. Socioeconomic effects of the Project is addressed in Section 3.7 of the Draft EA.	Section 3.7	Socioeconomics
2	c	Campbell County Economic Development	Campbell County Economic Development	11/30/2022	Wind turbine detractors point to the terrible aesthetics, the negative impact turbines have on biological life, noise pollution and upsetting natural wind currents, amongst other claims. Some answers to these claims are to not allow wind turbines to be built at all. Some communities place unrealistic set back minimums, zoning, and other regulatory restrictions to stop or curtail wind turbine construction, too. Granted, it is not always about the money. However, where or when could Campbell County find an additional \$150k in tax revenues in one year and repeating in following years? The answer is nowhere and not in the immediate future. What is the economic cost to stopping any or all energy production? The immediate answer is loss of large revenue sums which impact school district budgets, county services, and an overall reduction in prosperity.	Thank you for your comment.	Sections 3.4, 3.5, 3.7, 3.10	Socioeconomics

2	d	Campbell County Economic Development	Campbell County Economic Development	11/30/2022	Demands on our energy grid will continue to increase. New technologies for production, transmission and even energy consumption struggle to keep up with the increase demands. Are we willing to not charge our cell phones, tool batteries or other consumer products so we don't have to build wind turbines or other energy generating plants? The answer to that is "No", North Americans will not "make do" with less energy, tolerate brown or energy black outs. There is the argument that energy that is generated in Campbell County should stay in Campbell County. There are not a lot of communities these days which use their own generated energy. Can you imagine a manmade or natural disaster? It's hard enough trying to restore transmission service let alone restore local generation. The power grid is designed to help minimize negative impacts on communities during emergencies.	Thank you for your comment.	Sections 1.0, 2.0, 3.7	Project Description, Socioeconomics
2	e	Campbell County Economic Development	Campbell County Economic Development	11/30/2022	The wind blowing across Campbell County is plentiful and is not destroyed by utilizing it. It makes good sense to utilize a plentiful natural resource which doesn't have to be damaged to use it, does not require over burdensome monitoring or constant maintenance, and doesn't emit carbon pollutants to use it. Wind is a sustainable resource which will be harnessed by other communities who learn to balance the negative with the positive so that all interests can be served. The Law of Requisite Variety is in full affect for many rural South Dakota communities now. Just as it is in nature, those who can adapt (not necessarily conform) to a variety of changes, demands and opportunities will be the communities that survive in the future. CCED endeavors for Campbell County to not only survive but thrive.	Thank you for your comment.	Sections 1.0, 2.0, 3.7	Project Description, Socioeconomics
3	a	Susan Brandner	Private Citizen	11/2/2022	Landowner would like to know if they are getting a turbine on her land.	The Project design and layout is presented in Section 2.1.1 of the Draft EA	Section 2.1.1	Project Description
4	a	Delores Kluckman and Darlene Binfet (Kluckman Family Farm Trust)	Private Citizen	11/2/2022	Appreciated information presented in public scoping meeting. What is the definition of virgin land? There seems to be a hesitancy to use virgin land over cropland. Why is that?	Native, undisturbed tallgrass, mixed grass, and shortgrass prairie support a significant level of biodiversity. Less than 1% of original undisturbed prairie remains in South Dakota due to transitioning the land into farmland. Impacts to vegetation and land cover, as well as wildlife are addressed in Sections 3.3 and 3.4, respectively, in the Draft EA.	Sections 3.3, 3.4	Vegetation, Wildlife
4	b	Delores Kluckman and Darlene Binfet (Kluckman Family Farm Trust)	Private Citizen	11/2/2022	We are interested in the description of the footprint for Campbell County Wind Farm II.	The Project design and layout is presented in Section 2.1.1 of the Draft EA	Section 2.1.1	Project Description
5	a	Lisa Perman	Private Citizen	11/2/2022	Contact information provided	Thank you for your comment.	None	General Comments
6	a	Natural Resources Conservation Service - South Dakota Office	Natural Resources Conservation Service - South Dakota Office	10/27/2022	Thank you for the opportunity to provide a Farmland Protection Policy Act (FPPA) review on this project. The project as outlined will have no impact on prime or important farmland.	Thank you for your comment. This information has been incorporated into the Draft EA.	Section 3.1	Soils and Geologic Resources
7	a	South Dakota Game, Fish and Parks (SDGFP)	South Dakota Game, Fish and Parks (SDGFP)	11/30/2022	Siting of turbines and powerlines should avoid whooping crane habitat and a stringent whooping crane contingency plan should be developed, shared among relevant staff and agencies, and implemented. Include a detailed contact tree.	The Project will comply with the stipulations of the Upper Great Plains Wind Energy Programmatic Environmental Impact Statement (UGP PEIS), including the Programmatic Biological Assessment (PBA) developed under the UGP PEIS. This includes siting infrastructure to avoid, and minimize impacts where appropriate (see table 4.5-1 in the PBA). As outlined in the PBA consistency forms, the Project has infrastructure within one mile of wetlands, and therefore RWE has committed to fund mitigation of wetlands through a third-party mitigation provider within the South Dakota 95% whooping crane corridor and within the top five deciles of the Niemuth et al. (2018) model, or any 133.6 wetland acres within the SD 50% whooping crane corridor.	Section 3.5	Threatened and Endangered Species
7	b	South Dakota Game, Fish and Parks (SDGFP)	South Dakota Game, Fish and Parks (SDGFP)	11/30/2022	Migratory tree-roosting bats have high mortality rates during seasonal movements and can be especially high during fall migration. Turbine cut-in speeds would be increased during spring and fall bat migration. This can be further refined based on time of day (30 minutes before sunset to 30 minutes after sunrise), temperature ($\geq 50^{\circ}\text{F}$) and wind speed (≤ 10 mph). Increased cut-in speed from 1-3 m/s above manufacturer's cut-in speed have reduced mortality of all bats by at least 50%. Such efforts would help reduce mortality of the northern long-eared bat, a federally threatened species which has been acoustically detected in Walworth County. The status of this species will be reclassified as federal endangered effective 30 January 2023. Very high activity levels of migratory tree-roosting bats (especially eastern red bats; <i>Lasiurus borealis</i>) have been documented at Lake Hiddenwood State Park during the fall (GFP unpublished data). This Park is located to the southeast of the proposed project area. At least a 1,000-foot setback from potential bat habitat in the proposed project area should also be implemented.	The Project will comply with the stipulations of the Upper Great Plains Wind Energy Programmatic Environmental Impact Statement (UGP PEIS), including the Programmatic Biological Assessment (PBA) developed under the UGP PEIS. This includes avoiding siting turbines within 5 miles of hibernacula, or within 0.5 miles of known or presumed occupied foraging, roosting, and commuting habitat. RWE has committed to raising cut-in speeds from 3.0 m/s to 5.0 m/s during the fall period (8/15 – 10/15) following the species-specific minimization measures as described in the PBA to avoid any potential impact to the species.	Section 3.5	Threatened and Endangered Species; Wildlife
7	c	South Dakota Game, Fish and Parks (SDGFP)	South Dakota Game, Fish and Parks (SDGFP)	11/30/2022	Contiguous tracks of grassland (≥ 160 acres) have high conservation value. These areas should be identified and avoided if possible. Prairie grouse require large areas and conservation measures targeted at these species may also help other area-sensitive wildlife. Designate 1-mile setbacks around leks and establish 2-mile no-construction buffers from 1 March through 30 June. The best way to avoid grassland impacts is to place infrastructure in previously disturbed (e.g. cropland) areas.	The Project has conducted a grassland habitat assessment to determine tracks of unbroken grassland within the Project area. WAPA will work with RWE to develop best management practices if any contiguous tracks are identified within the Project Area. Prairie grouse surveys were completed in 2021 and 2023. These reports are included in Appendix A of the Draft EA.	Sections 3.3, 3.4, Appendix A	Wildlife, Vegetation

8	a	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	12/15/2022	<p>On November 30, 2022, the northern long-eared bat (<i>Myotis septentrionalis</i>) was uplisted from threatened to endangered. Our species page for this bat has updated information, and new guidance with be forthcoming on the above web pages as well as in our IPaC system website. With this uplisting, the 4(d) rule for the northern long-eared bat is retracted. Population- and species-level impacts of wind energy facilities have been identified as a significant concern for this species. The location of the Campbell County Wind Farm 2 is near the Missouri River; northern long-eared bats have been documented in the riparian habitat of the river. If the Campbell County Wind Farm 2 is ultimately constructed, we recommend several measures below to determine potential presence of the bat, reduce the risk of mortality, and ensure methods are adequate to detect any mortality that may occur.</p> <p>Our agency's Range-wide Indiana Bat & Northern Long-eared Bat Survey Guidelines are updated annually, typically in March, and are available on the following websites: https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines. We recommend close adherence to the methods in this document to evaluate the species presence at Campbell County Wind Farm 2. State and federal permits may be required for some activities. Note that a point of uncertainty in South Dakota is the northern long-eared bat's use of open areas; the bat's behavior in this western portion of the species range is suspected to be different than more forested habitats in the east and should be considered during surveys for this species.</p>	Acoustic surveys and a desktop habitat assessment have been completed under the most current version of the Range-wide Indiana Bat & Northern Long-eared Bat Survey Guidelines at the time of evaluation. Any additional acoustic or mist-net surveys will be conducted under the updated survey guidelines in coordination with the U.S. Fish and Wildlife Service.	Section 3.5	Threatened and Endangered Species
8	b	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	12/15/2022	<p>Among the most protective known measures to reduce collision mortality risk to bats, while minimally affecting wind facility operations and profitability, is increasing cut-in speeds ("feathering" turbine blades such that the blades are pitched into the wind to minimize spinning to less than two rotations per minute).</p> <p>We recommend wind turbine cut-in speeds of 5 meters/second during the fall migration period (approximately August 1- October 15), beginning 0.50 hours before sunset and ending 0.50 hours after sunrise. This recommendation is consistent with the requirements of the PEIS and associated Programmatic BA (PBA).</p> <p>To further minimize the risk of mortality for northern long-eared bats, we also recommend feathering turbines below manufacturer's cut-in speeds during the earlier portion of the bat active season (approximately April 15 – July 31), beginning 0.50 hours before sunset and ending 0.50 hours after sunrise. Feathering turbines below manufacturer's cut-in speeds may reduce general bat fatalities from 44-93% (Arnett et al. 2011) and has been adopted as an industry-wide conservation practice by many members of American Clean Power (https://cleanpower.org/news/wind-energy-industry-announces-new-voluntary-pract/).</p>	The Project will comply with the stipulations of the Upper Great Plains Wind Energy Programmatic Environmental Impact Statement (UGP PEIS), including the Programmatic Biological Assessment (PBA) developed under the UGP PEIS. This includes avoiding siting turbines within 5 miles of hibernacula, or within 0.5 miles of known or presumed occupied foraging, roosting, and commuting habitat. RWE has committed to raising cut-in speeds from 3.0 m/s to 5.0 m/s during the fall period (8/15 – 10/15) following the species-specific minimization measures as described in the PBA to avoid any potential impact to the species.	Section 3.5	Wildlife, Threatened and Endangered Species
8	c	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	12/15/2022	<p>In order to verify that any impacts to northern long-eared bat do not meet a re-initiation trigger under the ESA (50 CFR § 402.16) we recommend integrating the following standard post-construction fatality monitoring protocols into the project design, as well as a standard reporting date.</p> <p>Use Evidence of Absence (EoA) software (Dalthorp et al. 2017) to design a two-year post-construction monitoring plan using standardized definitions for inputs (e.g., spatial coverage, k, persistence distribution), where monitoring spans the bat active season (April 15 -October 15) and where the resulting cumulative detection probability achieved is a minimum of 0.20.</p> <p>If no northern long-eared bats are found during the first two years of post-construction monitoring, we recommend fatality monitoring at least once every seven years, planned as described above, where the resulting detection probability achieved is a minimum of 0.08, annually. This periodic monitoring will assist in verification that the risk profile has not changed, and a re-initiation trigger has not been met.</p>	The Project has committed to one year of post-construction monitoring that achieves, at minimum, an overall g-value of 0.2 for NLEB using an Evidence of Absence statistical approach to analyze fatality estimates (Dalthorp et al. 2017).	Section 3.5	Threatened and Endangered Species
8	d	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	12/15/2022	Measures are recommended specifically for the northern long-eared bat, but many could also apply to, and be protective of, many other bat species including those that may receive ESA protection in the future (e.g., tricolored bat [<i>Perimyotis subflavus</i>], currently proposed for listing as endangered). We recommend visiting the aforementioned northern long-eared bat and IPaC websites for updated guidance in the coming weeks and months.	CCWF2 has committed to best management practices and mitigation measures stipulated under the UGP PEIS, which would include reduced impacts to bat species. The Project is outside the range of the tricolored bat. Sections 3.4 and 3.5 of Draft EA provide additional detail regarding potential impacts to bat species.	Sections 3.4, 3.5	Wildlife, Threatened and Endangered Species

8	e	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	12/15/2022	<p>New information suggests whooping cranes may be of less risk for turbine collision than previously thought (Derby et al. 2018), but the birds have been shown to exhibit avoidance of turbines on the landscape out to a distance of up to 3.1 miles (Pearse et al. 2021). This avoidance may reduce their collision risk with turbines, but also reduces the amount of habitat available to migrating cranes near wind facilities. Currently in the PEIS/PBA, suitable wetland habitats are to be avoided by turbine placement by 1 mile. We recommend consideration of avoidance by greater distances whenever possible, up to 3.1 miles. To identify suitable habitats, the Niemuth et al. (2018) model should be used; this model is based on numerous known factors influencing whooping crane habitat use in the migration corridor and includes known stopover locations to provide probability estimates of wetland use in the North and South Dakota portions.</p> <p>Additionally, the PEIS and PBA include a minimization measure for whooping cranes that states "The acreage of wetlands that are potentially suitable migratory stopover habitat located within a 0.5 mi (0.8 km) radius of turbines may be mitigated based upon site-specific evaluations". While displacement impacts to cranes have been detected out to 3.1 miles, that avoidance is not absolute (Pearse et al. 2021). Some cranes do occur within 3.1 miles of turbines. We recommend considering this new information when determining the appropriate level of compensation for wetlands that cannot be avoided. The Niemuth et al. (2018) model is again our recommended tool to evaluate whooping crane habitat, identifying important areas that may be protected or restored to optimize benefits for the species. Compensation will require adequate funding and should be focused on local conservation, restoration, and/or creation of stopover habitat in the migration corridor. Such measures would be intended to preclude a "death by 1,000 cuts" scenario where incremental impacts to these habitats ultimately results in significant impacts to the last remaining wild migratory flock of whooping cranes.</p>	An evaluation was completed to assess whooping crane suitable habitat near the proposed turbines using Niemuth et al. (2018) model. Under the UGP PEIS, RWE has agreed to mitigate the acreage of wetlands that are potentially suitable migratory stopover habitat within 0.5 miles of turbines, based on the results of this evaluation.	Section 3.5	Threatened and Endangered Species
8	f	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	12/15/2022	The location of both the original Campbell County Wind Farm and the currently proposed Campbell County Wind Farm 2 are in an area where both golden (Aquila chrysaetos) and bald eagles (Haliaeetus leucocephalus) are known to occur. The Campbell County Wind Farm became operational in December of 2015, and within three months, a golden eagle was killed at the facility via collision with a spinning turbine. We subsequently recommended initiation of an eagle conservation plan and application for an eagle take permit that would apply to both Campbell County Wind facilities. To date, that process has not been completed. Our agency has recently proposed a streamlined process for eagle take permits (87 FR 59598; Sept. 30, 2022). The proposal is intended to increase the efficiency and effectiveness of permitting, facilitate and improve compliance, and increase the conservation benefit for eagles by creating general permits for certain activities under prescribed conditions, including one for qualifying wind-energy generation projects. We continue to recommend an eagle take permit for these Campbell County wind energy facilities in anticipation of additional eagle mortalities.	Thank you for the comment. Use of the new streamlined process for eagle take permits is being considered for the Project and it is expected that CCWF2 will coordinate with the USFWS as appropriate.	Section 3.4	Wildlife
8	g	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	12/15/2022	In the attached document, we provide additional information and recommendations regarding important wildlife habitats and U.S. Fish and Wildlife Service (Service) trust resources including federally listed species, eagles, migratory birds (including birds of conservation concern, species of habitat fragmentation concern) that may occur in the project area and vicinity. We have included guidelines and methods to be applied to various components of a wind farm including turbines, meteorological towers, and power lines in order to avoid, minimize and/or compensate for impacts to trust resources and assist you in achieving compliance with Federal laws (Attachment provided with letter). If changes are made in the project plans or operating criteria, or if additional information becomes available, the Service should be informed so that the above determinations can be reconsidered.	Thank you for the comment. Impacts to wildlife, and the BMPs to avoid, minimize and mitigate impacts to these resources are discussed in Section 3.4 of the Draft EA.	Section 3.4	Wildlife
9	a	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>Existing resource conditions provide the basis for an effective analysis of potential impacts. Therefore, the EPA recommends that WAPA include the following baseline aquatic resource information in the EA:</p> <p>A publicly available map and summary of Project area waters and downstream waters, including streams, lakes, springs, and wetlands. It would be helpful if the EA identified high resource value water bodies and their designated beneficial uses (e.g., agriculture, fisheries, drinking water, treaty rights, recreation);</p> <p>Watershed conditions, including vegetation cover and composition, and soil conditions;</p> <p>Surface water information, including available water quality data in relation to current South Dakota surface water quality standards, stream functional assessments, stream channel/stream bank stability conditions, sediment loads, and aquatic life;</p> <p>Identification of types, functions, conditions, and acreages of wetlands, riparian areas, streams (including perennial, intermittent, and ephemeral) and springs;</p> <p>Available groundwater information, including information about quality and location of aquifers;</p> <p>Location and extent of hydrologically connected zones and shallow aquifers in proximity to proposed Project facilities;</p> <p>Areas of geologic or other areas of instability that may affect water quality;</p> <p>A map and list of Clean Water Act (CWA) impaired or threatened water body segments within, or downstream of, the Project area, including the designated uses of the water bodies and the specific pollutants of concern. The South Dakota Department of Environmental and Natural Resources can identify/validate any such CWA Section 303(d) listed water bodies; and</p> <p>Identification of any water resources important to drinking water.</p>	WAPA thanks you for your comment. The requested baseline water resource information is described in Section 3.2 of the Draft EA.	Section 3.2	Water resources

9	b	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>Water quality data for the streams and lakes located within the Project area provide important information for evaluation of the influence of the Project on downstream water quality. Such information can then guide management for the Project, with the data providing a baseline for future monitoring of impacts. We recommend that the EA provide a summary of available information and monitoring data on water quality for the Project area and downstream waters affected by activities in the Project area, including parameters such as total phosphorus, total nitrogen, total dissolved solids, total suspended solids, turbidity, and temperature. It will also be important to include water quality data for parameters listed for impaired water bodies within or downstream of the Project area. South Dakota can further assist in the identification of impaired waters and development of total maximum daily loads for impaired waters under Section 303 of the CWA, as well as in identifying any significant gaps in available data that may be useful in informing a water quality monitoring plan for the Project</p>	WAPA thanks you for your comment. The requested baseline water resource information is described in Section 3.2 of the Draft EA.	Section 3.2	Water resources
9	c	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>Surface disturbance is an important source of sediment to streams, which can smother aquatic habitat, disrupt natural food chains, increase nutrient loads, and alter stream morphology and function. Construction can cause short-term but substantial increase in sediment delivery to streams, and roads modify natural drainage patterns and can increase hillslope erosion and downstream sedimentation on a long-term basis. Evaluating the erosion hazard rating of soils in the Project area can be helpful in identifying areas where siting and construction of roads, collection lines, and turbines could result in damaging levels of soil erosion and sediment delivery to streams. According to our review of soil data presented in the Natural Resource Conservations Service's Web Soil Survey, the erosion hazard of most of the Project area's soils are characterized as a mix of those with "Moderate" and "Severe" erosion hazards. Soils with a "severe" rating are described as follows: "Significant erosion can be expected. Roads require frequent maintenance. Costly erosion control measures are needed." With consideration of this information, we recommend the EA discuss the potential effects from the Project on surface erosion, potential mass wasting on slopes, and delivery of surface sediment and debris to streams within or adjacent to the Project area. We also recommend avoiding surface disturbance in areas with "Severe" erosion hazard to the extent practicable in the final design and configuration of wind turbines and their associated pads. Road stream crossings are one of the largest chronic inputs of eroded sediment to streams and can cause extensive acute impacts of increased sedimentation through hydrologically connected zones. Changes to the biological components of these connected zones from sedimentation can cause important consequences to the overall function of the entire watershed ecosystem. With these considerations in mind, we recommend the EA include a clear map(s) of road placement in relation to water resources and evaluate the potential impacts of the roads on watershed and aquatic ecosystem structure and function.</p>	WAPA thanks you for your comment. Impacts due to surface disturbance is described in Section 3.1 of the Draft EA.	Section 3.1	Soil and Geologic Resources
9	d	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>Wetlands and riparian areas increase landscape and species diversity, support many species of western wildlife and are critical to the protection of water quality and designated beneficial uses of waterbodies. Installation of wind turbine generators, electric collection and transmission lines, and construction of access roads, substations, switchyards, and maintenance areas all have potential to affect wetlands in the project area. The EPA recommends that the EA describe how WAPA intends "to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands," as described in EO 11990. Specifically, the EA should identify and evaluate specific methods to protect wetlands, riparian areas, and floodplains, including a clear list of mitigation requirements and BMPs applicable for construction, operation, and reclamation activities to prevent adverse impacts to these aquatic resources. This list of measures should include, as appropriate, mitigation found in the April 2015 PEIS, and could also include actions such as: use of wetland and riparian habitat buffer zones to avoid adverse effects to these critical resources, the use of stormwater control measures, marking of perennial seeps, springs, and wetlands on maps and on the ground before commencing construction to facilitate their avoidance and protection, and enhanced monitoring of resource conditions for high value water and riparian resources. To ensure that wetlands are protected to the greatest extent possible, it may be necessary to consider exclusion of roads or turbines in areas where wetlands or riparian area would be adversely impacted. Discharge of dredged or fill material into waters of the U.S., including wetlands, is regulated under CWA Section 404. This permit program is administered jointly by the U.S. Army Corps of Engineers (USACE) and the EPA. We recommend that Campbell County LLC and WAPA consult with USACE to make a final determination as to the applicability of CWA Section 404 permit requirements to wetlands that would be impacted by any new construction in the Project area. The EPA encourages this coordination as early as possible in the planning of the proposed Project. As appropriate, the EA should be developed to provide sufficient information and support for decisions in compliance with the EPA's CWA Section 404(b)(1) Guidelines</p>	WAPA thanks you for your comment. The requested baseline water resource information is described in Section 3.2 of the Draft EA.	Section 3.2	Water resources
9	e	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>In addition to impacting water quality, construction of linear facilities and/or roads that cross streams or dislodge erosive soils can have disproportionate impacts on stream hydrologic, geomorphic, and biological functions such as sediment transport, nutrient cycling, floodplain interspersation and connectivity, fish spawning, and overall aquatic habitat quality. Construction, increased road use, and introduction of heavy construction equipment can compact soil and disturb or eliminate vegetative cover, decreasing water infiltration and increasing surface runoff and erosion. These effects are magnified on steep slopes or in erosive, unstable soils and would have detrimental effects on stream function. We recommend WAPA's EA include functional or condition assessments for the streams in the Project area to help evaluate the impacts of construction and operational alternatives and choose the option that would have the least impacts to stream functions.</p>	WAPA thanks you for your comment. Impacts to surface water resources are discussed in Section 3.2 of the Draft EA.	Section 3.2	Water resources

9	f	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>The EPA recommends the development of design elements to avoid aquatic resource impacts wherever possible and mitigation measures to minimize unavoidable impacts to water quality, stream functions and aquatic habitats from surface disturbance, road-stream crossings, and storm water runoff. Such measures include locating roads away from streams and riparian areas, steep slopes, landslide prone areas or erosive soils, and providing special protections such as setbacks or non motorized zones for areas with high quality or high value water resources.</p> <p>The EPA further recommends that impacts to aquatic resources determined to be "difficult to replace" under the EPA and USACE Final Rule for Mitigation for Losses of Aquatic Resources [33 CFR Parts 325 and 332; 40 CFR Part 230 (73 FR 19594; April 10, 2008)] be avoided and minimized to the maximum extent practicable, particularly in areas where waterbody crossings could occur. Such resources may include fens, springs, and streams. Unless other resource concerns outweigh aquatic resource impacts, we recommend identifying corridor alignments that minimize potential impacts to these aquatic resources. If more damaging, open-cut water body crossings are proposed, we recommend using mitigation measures to stabilize and return stream banks to preconstruction contours, and grading and revegetating waterbody crossing areas immediately following construction. We recommend that riprap, gabions, or other methods to harden banks not be used or used only sparingly for long-term erosion control and bank stabilization at stream crossings. The EPA supports an overall goal to return construction sites to natural, preconstruction conditions.</p> <p>Events during construction of the Project, including road building and upgrades, such as vehicular spills of hazardous or toxic materials could result in significantly more adverse habitat and water quality impacts. We recommend the EA describe vehicle maintenance facilities (as applicable), and spill and release response capabilities. BMPs include storing chemicals for Project activities in closed containers with secondary containment in a</p>	WAPA thanks you for your comment. Impacts to water resources, and the BMPs to avoid, minimize and mitigate impacts to these resources are discussed in Section 3.2 of the Draft EA.	Section 3.2	Water resources
9	g	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>The EPA appreciates Campbell County LLC's ongoing extensive studies of wildlife resources, particularly for eagles and other migratory birds, in the Project area. We recommend coordinating with the U.S. Fish and Wildlife Service and South Dakota Game, Fish and Parks officials during evaluation of all existing wildlife resources and migration corridors, impacts from micro siting decisions and avoidance measures. The EPA also recommends conducting independent and transparent post-construction monitoring of raptor, avian, and bat deaths or injuries to help inform mitigation and calculating any compensatory mitigation amounts for the loss of ecologically important, federally protected birds. We recognize that any consultation around endangered species would be achieved in accordance with the Programmatic Biological Assessment (PBA) developed in association with the 2015 Wind PEIS. The PBA identifies avoidance and minimization measures to address potential adverse impacts on listed species in the proposed Project area. In accordance with the PBA process, the EPA encourages WAPA to fully disclose Campbell County LLC's commitments to implement appropriate avoidance and minimization measures for protected species from effects of the proposed Project in the EA.</p>	WAPA thanks you for your comment. Impacts to wildlife, and the BMPs to avoid, minimize and mitigate impacts to these resources are discussed in Sections 3.4 and 3.5 of the Draft EA.	Sections 3.4, 3.5	Wildlife, Threatened and Endangered Species
9	h	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>Management of noxious weeds is an important issue to address in the EA since these species tend to gain a foothold where there are disturbances to the landscape. We recommend the EA provide information on the current state of invasive species in the Project area and how alternatives may impact distribution and prevalence of invasive species. We further recommend that the EA disclose specific management actions that will address invasive species through prevention, early detection and rapid response, and restoration and rehabilitation. If any herbicides will be used to treat noxious weeds, we recommend disclosing any potential hazards related to the application of the chemicals and describing what actions will be taken to minimize impacts of toxic substances released into the environment.</p>	Consultation with Campbell County Weed and Pest Control Supervisor and the South Dakota Weed & Pest District Commission will occur during construction and operations of the Project. Best management practices for Land Cover and Vegetation are discussed in Section 3.3 of the EA.	Section 3.3	Vegetation, Noxious weeds
9	i	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>Consistent with Executive Orders 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (86 Fed. Reg. 7009 (Jan. 25, 2021)) and 14008, Tackling the Climate Crisis at Home and Abroad (86 Fed. Reg. 7619 (Feb. 1, 2021)), the EPA recommends meaningfully engaging with rural communities and stakeholders to understand their experiences and address their concerns with respect to the potential impacts from the proposed Project to the human and natural environments. Rural communities (including subsistence households) are often more closely linked to ecosystems and their services, making it especially important that people living in such communities have opportunities for input into decision-making about local land use and utilization of natural resources, including how federal actions may affect their access to and management of natural resources and active agricultural lands, as well as resources of traditional, cultural, and religious significance to tribal communities.</p>	A public scoping meeting was held virtually on November 2, 2022. Federal, state, and local agencies were invited to the meeting to provide comments regarding the Project. The public was invited through newspaper and radio announcements, and residents within and adjacent to the Project Area were notified via direct mailing. The public scoping meeting documentation is included in Appendix B. Comments received regarding the Project from agencies and the public are included in Appendix B along with WAPA's responses.	Appendix B	Public Scoping
9	j	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	<p>Given the proximity of the project area to the Standing Rock Reservation, Cheyenne River Reservation, and Crow Creek Reservation and the Project setting, it is especially important that formal government-to-government consultation take place early in the scoping and design phase of the project to ensure that all issues are adequately addressed in the EA. The principles for interactions with tribal governments are outlined in the presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships (January 26, 2021), and Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 6, 2000). The EPA recommends that the EA summarize the results of tribal consultation for the Project and identify the main concerns expressed by the tribes located historically in these areas about the proposed Project, and how those concerns are addressed. As a resource, we recommend the document Tribal Consultation: Best Practices in Historic Preservation, published by the National Association of Tribal Historic Preservation Officers.</p>	Local tribes have been contacted by WAPA and will be consulting on the project. A summary of tribal consultation is located in Section 5.0 of the Draft EA.	Section 5.0	Tribal consultation

9	k	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	Limited broadband and media access in rural locations may warrant using various outreach strategies, such as email, letter, phone calls, and advertising of public meetings in local community venues (e.g., at markets, community centers, and community events). Meaningful engagement can also be fostered by presenting a clear Project purpose, adequate information, and associated stakes; and continuing to provide timely information and opportunities for input on an ongoing basis. Limited broadband access by members of rural communities may warrant holding public meetings about the proposed Project in rural locations, in addition to providing an option for virtual participation, and at times when community members are most likely to be able to participate. In planning meetings, we recommend accounting for working hours and harvest times, driving distances and winter weather conditions, and cultural and seasonal practices and events (e.g., tribal ceremonies or local fish and game season openings). The EPA recommends that the EA consider both impacts and benefits of the Project on social structures, at both the community and family-level, therefore meaningful engagement with rural stakeholders is necessary to fully inform such an analysis. Engaging trusted community intermediaries and tailoring engagement to distinct segments of the population can also build trust, as can walking the project area to facilitate mutual understanding of the circumstances and concerns facing rural stakeholders. Potential disconnection of rural communities from largely urban-based political power structures and limited organization and influence over the factors that impact their well-being make such outreach and engagement strategies especially important. We recommend that the EA describe both the process and outcome of engagement with rural communities, including how their concerns were addressed in the consideration of siting alternatives. As part of this, we recommend that the EA include as an appendix who was	A public scoping meeting was held virtually on November 2, 2022. Federal, state, and local agencies were invited to the meeting to provide comments regarding the Project. The public was invited through newspaper and radio announcements, and residents within and adjacent to the Project Area were notified via direct mailing. The public scoping meeting documentation is included in Appendix B. Comments received regarding the Project from agencies and the public are included in Appendix B along with WAPA's responses.	Appendix B	Public Scoping
9	l	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	The EPA recommends the EA consider and disclose impacts to communities from this Project considering impacts from past, present, and reasonably foreseeable planned actions. Specifically, we recommend that the EA consider whether local communities may already be experiencing existing pollution or social/health burdens and how the proposed Project may potentially result in disproportionate impact in that context. The EPA recommends that the EA accurately describe the nature of cumulative impacts from the proposed wind farm to the rural nature of the communities in and around the project area. Given the predominately rural character of the project area and the existing Campbell County Wind Farm, the proposed Project would further introduce industrial components from wind energy infrastructure to the landscape. We recommend that the EA discuss the introduction of increased industrial effects common to operating wind generation projects such as increased dust, sound, vibration, and flicker effects to the rural community. Full consideration of cumulative impacts from the proposed Project area would be well served by on going, meaningful outreach with project area residents, community representatives, and tribal leaders, particularly in developing an understanding of such effects to public health, local agricultural activities, and rural ways of life.	Cumulative impacts are addressed in Section 4.0 of the Draft EA	Section 4.0	Cumulative impacts
9	m	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	While we understand that construction of new roads and improvement of existing roads to access individual turbines and other ancillary facilities is a part of the proposed Project, it is not clear if the proposed project would result in increased loads, impacts, or burdens on local infrastructure, including roads and local utilities. The EPA recommends that the EA examine whether the existing infrastructure can handle increased burden (temporary and permanent). We further recommend that the EA assess potential impacts from increased trash and disposal of solid wastes (including hazardous waste) at local collection sites due to Project construction and decommissioning, and increased use of local roads and associated damages, such as berm damage and wash-boarding of roads, leading to increased maintenance costs and blading of roads. We recommend that WAPA and Campbell County LLC consider the potential for increased monitoring and emergency response costs as a part of this analysis.	Transportation impacts are addressed in Section 3.9 of the Draft EA. Health and Safety impacts are addressed in Section 3.13 of the Draft EA.	Section 3.9 and 3.13	Transportation, Public Safety and Health
9	n	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	The EPA recommends that the EA describe how the Project would be affected by foreseeable changes from predictable trends in the affected environment, for instance, under a scenario of continued decreasing precipitation days, changing frequency of intense storms and related flood events, and increasing drought intensity in the Project area. Full consideration of influences from the Project setting on the proposed Project may inform necessary design modifications to enhance Project resiliency and changes to operational assumptions for determining resource supplies, system demands, system performance requirements, and operational constraints. We recommend that WAPA and Campbell County LLC analyze potential impacts of current and predictable trends to the proposed action's affected environment associated with the proposal and its alternatives. The US Climate Resilience Toolkit (https://toolkit.climate.gov/) serves as a repository of information related to climate resilience in the U.S., including steps to build resilience, case studies, expertise, and special topic areas, including renewable energy technology development. The EPA's Climate Change Indicators (https://www.epa.gov/climate-indicators) presents a key set of indicators related to the causes and effects of climate change. EPA partners with various government agencies, academic institutions, and other organizations to compile these indicators that are used to understand and track the science and impacts of climate change. In addition, we suggest that this Project EA consider resiliency and adaptation measures based on how future precipitation and flood trends may impact the Project and the ability of Campbell County LLC to effectively protect the resources in the Project area from unintentional deleterious impacts due to long-term, severe drought conditions already being experienced in the proposed Project area. 5 The Fourth National Climate Assessment released by the U.S. Global Change Resource Program (https://nca2018.globalchange.gov/), contains scenarios for regions and sectors. Using NCA or other peer reviewed scenarios to inform the NEPA analysis and possible changes to the proposal can improve the ability of Campbell County LLC to build in resilience and preparedness in their management plans for persistent alterations in the existing environmental setting.	Climate change is addressed in Section 6.2.2.5 of the Upper Great Plains Programmatic Environmental Impact Statement, to which this EA is tiered. Additional information regarding climate change is included in Sections 3.6 and 3.13 of the Draft EA.	Sections 3.6 and 3.13	Climate change

9	o	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	NEPA provides federal agencies the opportunity to analyze and disclose potential negative and beneficial impacts from a proposed energy project and to build its internal base of knowledge and expertise. The EPA supports informed development of renewable energy generation facilities to meet demand for new sources of electricity. Such energy sources are consistent with decarbonization pathways that are necessary to meet science-based targets for greenhouse gas reductions as articulated in The Long-term Strategy of the United States: Pathways to Net Zero Greenhouse Gas Emissions by 2050 (November 2021). ⁶ We have reviewed and appreciate the analysis and discussion of green-house gas emissions related to construction, operation, and decommissioning of land-based wind development found in Section 5.2.1 of the WAPA PEIS (DOE/EIS-0408). As this EA will be tiered to the 2015 PEIS, we recommend the EA present project-level analysis of GHG emissions for construction, operation and decommissioning of the proposed Project. We recommend the EA analyze and discuss GHG emissions in the context of national GHG reduction and state reduction targets, and how the Project would support achievement of those goals or targets. In particular, we recommend that the EA discuss potential reduction in regional GHG emissions from the proposed Project, as predicted in WAPA's Upper Great Plains region in the 2015 PEIS. We suggest that WAPA consider disclosing climate benefits from the Project using the estimated social cost of GHGs (SC-GHG) established by the Interagency Working Group on SC-GHG, as appropriate, to provide useful information to the public and WAPA decision makers around the GHG emissions benefits from wind energy infrastructure. The SC-GHG provides a comprehensive estimate (in dollars) of the long-term damage done by GHG emissions each year from existing or planned increase in fossil fuel-based sources of energy, and this dollar figure can be used to represent the value of damages avoided due to GHG reduction actions (e.g., proposed wind energy Project to meet future increased demand).	Climate change is addressed in Section 6.2.2.5 of the Upper Great Plains Programmatic Environmental Impact Statement, to which this EA is tiered. Additional information regarding climate change is included in Sections 3.6 and 3.13 of the Draft EA.	Sections 3.6 and 3.13	Climate change
9	p	U.S. Environmental Protection Agency (USEPA) Region 8	U.S. Environmental Protection Agency (USEPA) Region 8	12/1/2022	The EPA appreciates WAPA's consideration of our comments at this stage of the NEPA process and look forward to reviewing the Draft EA.	Thank you for your comment.	--	General comment
10	a	Werner Family Farm LLC - Richard Werner	Private Citizen	11/8/2022	Fully support Campbell County Wind Farm 2.	Thank you for your comment.	--	General comment
11	b	USFWS - Sand Lake Wetland Management District	USFWS - Sand Lake Wetland Management District	10/28/2022 Voicemail	Hello, my name is Nate Williams. I work for Sand Lake Wetland Management District. We manage lands in Campbell County where you guys have the proposed wind farm two project. I just wanted to talk to someone regarding some information and the Project, so if you could please give me a call when you get a chance you can reach me on my cell phone at 815-541-1385. Thanks, bye.	Thank you for your comment, this information has been incorporated into the Draft EA.	Section 3.3	Land Use
12	c	Scout Rau - Campbell County Commissioner	Scout Rau - Campbell County Commissioner	11/2/2022 Voicemail	This is Scott Rau Campbell County Commissioner, really don't have any questions, more of a comment. I was a part of the Commission on Phase 1 we had a few small issue with having the road haul agreements before the trucks were rolling, and also overload, over width and over length permits. We had equipment coming in without the permits purchased. Also we now have building permits that need to be purchased before any construction starts. For a comment, please have this stuff taken care of before things get rolling. It would make it a better neighbors for everybody it would work best for the county. Also I would leave our highway superintendent as much information as you can, and also keep the county commission informed as much as possible. I know last time we had some contractors that were part of the building process and thought that they did not have to use the road haul agreements. We feel that anyone that is doing anything on the Project should be using the same road haul agreements so we can keep track of the roads and make sure nothing is getting destroyed. That is all I had for a comment.	Thank you for your comment. Transportation impacts are addressed in Section 3.9 of the Draft EA. A summary of commitments made and best management practices for Transportation, Land Cover, and Air Quality are located in Sections 3.9.2.4., 3.3.2.3, and 3.6.2.1 respectively.	Section 3.9	Transportation
Comments Received during Draft EA Public Comment Period								
13	a	Anonymous	Private Citizen	10/30/2024	The biggest scam in the history of the world!	Thank you for your comment.	--	General comment
14	a	Bill Wientjes	Private Citizen	10/30/2024	We are not in favor of this farm. Wish the current wind farm was further north of our property. We should invest into coal again and less wind.	Thank you for your comment. Since October 2015, WAPA's Upper Great Plains (UGP) Region has been a transmission owner member of the Southwest Power Pool (SPP), and its qualifying facilities are under the functional control of SPP. Excess transmission capacity on and interconnection to WAPA-UGP's facilities must be done in accordance with the SPP Tariff. Socioeconomic and cumulative impacts are addressed in Sections 3.7.2 and 4.0 of the Final EA	Sections 3.7 and 4.0	Socioeconomics, Cumulative impacts
15	a	Schuetzle Farms Inc, ATTN: Merle & Deb Schuetzle	Private Citizen	10/30/2024	We tried to review the Draft Environmental Assessment online but it state that this address wasn't available.	We are sorry that the online portal did not function correctly when you attempted to comment. Please see our email response to resolve this issue.	--	General comment
16	a	Dick Werner	Private Citizen	10/30/2024	We fully support this project development.	Thank you for your comment.	--	General comment
17	a	Dawn Janson	Private Citizen	10/30/2024	Glad to be part of your wind farm.	Thank you for your comment.	--	General comment
18	a	Natural Resources Conservation Service - South Dakota Office	Natural Resources Conservation Service - South Dakota Office	9/4/2024	Thank you for the opportunity to provide a Farmland Protection Policy Act (FPPA) review on this project. The project as outlined will have no impact on prime or important farmland.	Thank you for your comment. This information has been incorporated into the Draft EA.	Section 3.1	Soils and Geologic Resources
19	a	Rural Utility Service ATTN: Shawn Boone	US Department of Agriculture Rural Utility Service	9/20/2024	Hi Mr. Russell, this is Shawn Boone. I'm with Rural Utility Service with the USDA. I got a notice from my supervisor about your draft EA about the Campbell County Wind Farm 2 and I had a couple questions for you if you could give me a few minutes of your time. My number is 894-202-5472. Again, Shawn Boone with the Rural Utility Service at 894-202-5472. Thanks.	Thank you for your comment. CCWF2 has confirmed no federal funding will be sought as part of the Project.	--	General comment

20	a	US EPA Region 8 ATTN: Melissa McCoy	US Environmental Protection Agency Region 8	9/30/2024	The EPA supports these 2015 PEIS BMPs and Mitigation Measures and recommends that WAPA's final EA and NEPA decision document clarify how these practices and measures will be monitored, maintained, and enforced, and by whom. We also recommend incorporating these mitigation measures in the FONSI and/or the Record of Decision (see 40 C.F.R. § 1501.6(d)), and that the final EA include a clearly defined monitoring plan for aquatic resources in accordance with the recently updated Council on Environmental Quality's (CEQ) NEPA Implementing Regulations at 40 C.F.R. § 1505.3(c), including an operational plan for finding and solving runoff problems.	All stream and wetlands crossed by collection lines would be avoided through the use of the bore method, and the one access road crossing of a stream would be constructed in compliance with USACE Nationwide Permit 14, including all relevant regional and state conditions. The Project would also comply with CWA Section 402 through obtaining a Stormwater Permit for Construction Activities through the South Dakota Department of Agriculture and Natural Resources (SDDANR). This permit requires development of a SWPPP as well as regular inspection of the site to ensure compliance. The USACE has jurisdiction over dredge and fill crossings under Section 404, and the SDDNR would have authority to review the Project's compliance under Section 402.	Section 3.2	Water resources
20	b	US EPA Region 8 ATTN: Melissa McCoy	US Environmental Protection Agency Region 8	9/30/2024	Table 3.2-1 of the EA states that the proposed Project area includes 38.6 miles of intermittent streams, and 0.3 miles of perennial Spring Creek. Spring Creek is a Clean Water Act Section 303(d)-listed impaired water body not meeting beneficial use criteria for dissolved oxygen. The EA states that Project facilities are sited away from Spring Creek, and the majority of Project components are located in upland areas, mostly avoiding low-lying wetlands and streams. It is not clear in the draft EA how the intermittent and ephemeral streams, lakes, and ponds will be avoided, and to what extent, during the construction and operation of the Project. Therefore, we recommend evaluating impacts to these waterbodies, including impacts caused by stream crossings[...]Considering these streams make up the majority of water resources in the arid and semi-arid west, a full analysis should consider these important functions when analyzing potential direct, indirect and cumulative impacts to the water resources in or near the Project area.	Since the Draft EA was published, wetland and waterbody delineations have been conducted by the applicant and a report presenting these findings is included in Appendix C of the Final EA. The field-verified delineation data identified 5 intermittent stream crossings and 4 wetland crossings, as summarized in Section 3.2.2.1 of the Final EA. One intermittent stream would be impacted at a single collection line and access road crossing; all other crossing locations would be avoided through boring the collection line underneath the stream or wetland. WAPA has evaluated the potential impacts of these crossings in Section 3.2.2.1. The applicant is seeking authorization under Nationwide Permit (NWP) 14 for a single crossing, which requires the crossing to be in compliance with Sections 401, 402 and 404 of the Clean Water Act, among other laws. Potential adverse impacts and compliance with these laws is controlled by the terms of the NWP, regional and case-specific conditions, and the review process that is undertaken prior to the issuance of NWPs. Adherence to these conditions by the Applicant, in particular Section 401 water quality certification conditions for NWPs as established by the State of South Dakota, are expected to avoid or minimize additional contribution to the impaired Spring Creek.	Section 3.2	Water resources
20	c	US EPA Region 8 ATTN: Melissa McCoy	US Environmental Protection Agency Region 8	9/30/2024	We recommended that the draft EA discuss the potential effects of the Project on surface erosion, potential mass wasting on slopes, and delivery of surface sediment and debris to intermittent and ephemeral streams within or adjacent to the Project area.	The potential effects from the Project on surface water resources due to surface erosion is discussed in Section 3.2.2.1.	Section 3.2	Water resources
20	d	US EPA Region 8 ATTN: Melissa McCoy	US Environmental Protection Agency Region 8	9/30/2024	We also noted in our scoping comments that road-stream crossings are one of the largest chronic inputs of eroded sediment to streams, and we recommend that the final EA include a map of temporary and permanent road placement in relation to water sources in the Project area so that an analysis of effects can be undertaken.	The potential effects from the Project on surface water resources associated with the proposed road-stream crossing is discussed in Section 3.2.2.1.	Section 3.2	Water resources
20	e	US EPA Region 8 ATTN: Melissa McCoy	US Environmental Protection Agency Region 8	9/30/2024	The BMPs and Mitigation are not a substitute for site-specific analysis of potential erosion and sediment loading from the Project's crossings of streams. The EPA recommends considering whether information collected as part of monitoring efforts conducted for the existing Campbell County Wind Farm may inform on potential impacts.	The Project has a total of 5 stream crossings, as discussed in Section 3.2.2.1. Four crossings would be made by collection line construction, which would avoid impacts through use of the bore method. The new access road crossing of an intermittent stream would be constructed in compliance with USACE Nationwide Permit 14, including all relevant regional and state conditions, many of which would reduce erosion and sediment loading at the crossing during construction and operation of the Project. Site-specific monitoring was not conducted for the existing Campbell County Wind Farm. Given the avoidance of 4 stream crossings, and the limited potential impacts associated with the single access road crossing in compliance with NWP 14, WAPA has determined a site-specific analysis of erosion and sediment loading is not warranted.	Section 3.2	Water resources
20	f	US EPA Region 8 ATTN: Melissa McCoy	US Environmental Protection Agency Region 8	9/30/2024	While the draft EA states the benefits of wind power overall in year 2022 in monetary terms of dollars per MWh, the EPA recommends that the WAPA use EPA's 2023 SC-GHG estimates to monetize the value of net changes in GHG emissions resulting from the Project itself. This analysis would also assess climate benefits of the Project. The EPA also recommends that SC-GHG calculations give specific information regarding the social cost estimate related to individual gases (i.e., use SC-CO2 to monetize CO2 emissions changes, and use SC-CH4 to monetize CH4 emissions changes).	SC-GHG estimates and specific information regarding the social cost estimate related to individual gases was drafted in the Final EA in response to this comment; however, it was then removed due to the Executive Order on Unleashing American Energy.	Section 3.6	Air Quality and Climate
20	g	US EPA Region 8 ATTN: Melissa McCoy	US Environmental Protection Agency Region 8	9/30/2024	The EPA further recommends that the final EA discuss how reasonably foreseeable GHG emissions are consistent with state or federal GHG reduction policies or goals. For example, the final EA could discuss how emissions help or hinder meeting GHG reduction targets set at the federal, state, or local level as required in 40 C.F.R. § 1506.2(d), including the U.S. 2030 Paris GHG reduction target and the 2050 net-zero pathway.	GHG emissions and their association with state and federal GHG reduction goals and policies is addressed in Section 3.6.2.	Section 3.6	Air Quality and Climate
20	h	US EPA Region 8 ATTN: Melissa McCoy	US Environmental Protection Agency Region 8	9/30/2024	EPA appreciates WAPA's commitment to present the results of consultation with the USFWS, including final determinations, in the Final EA. The EPA recommends that any post-construction monitoring include calculation of compensatory mitigation amounts for the loss of ecologically important, federally protected birds.	An evaluation was completed to assess federally-protected whooping crane suitable habitat near the proposed turbines using Niemuth et al. (2018) model. Under the UGP PEIS, RWE has agreed to mitigate the acreage of wetlands that are potentially suitable migratory stopover habitat within 0.5 miles of proposed turbines and alternate turbines, which would entail 133.6 acres. Operational monitoring of whooping cranes would be also be conducted at the Project during whooping crane migration seasons. Staff would be trained to identify whooping cranes, and turbines within 2.0 mi of whooping cranes would be shut down until the whooping cranes moved on naturally, as per the Project's whooping crane operational monitoring plan included in Appendix G.	Section 3.4	Wildlife Resources
21	a	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office	10/3/2024	Currently it appears that 5.7 acres of wetland habitat and 0.3 acres of riverine habitat may be temporarily or permanently impacted. The U.S. Fish and Wildlife Service (Service), in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347) and other environmental laws and rules, recommends complete avoidance of these areas, if possible. If avoidance is not possible, attempts should be made to minimize adverse impacts. Finally, if adverse impacts are unavoidable, measures should be undertaken to replace the impacted areas. The goal should be to achieve "no net loss" of wetlands as outlined in Executive Order #11990. We recommend identification of drained wetlands and the use of ditch plugs as a simple means to restore wetland acres on the landscape if compensation is necessary.	Wetland and waterbody delineations have been conducted by the applicant and a report presenting these findings is included in Appendix C of the Final EA. The field-verified delineation data identified 5 intermittent stream crossings and 4 wetland crossings, as summarized in Section 3.2.2.1 of the Final EA. One intermittent stream would be impacted at a single collection line and access road crossing; all other crossing locations would be avoided through boring the collection line underneath the stream or wetland. WAPA has evaluated the potential impacts of these crossings in Section 3.2.2.1. The applicant is seeking authorization under Nationwide Permit (NWP) 14 for a single crossing, which requires the crossing to be in compliance with Sections 401, 402 and 404 of the Clean Water Act, among other laws. Potential adverse impacts and compliance with these laws is controlled by the terms of the NWP, regional and case-specific conditions, and the review process that is undertaken prior to the issuance of NWPs. No net loss of wetlands is expected from construction and operation of the Project.	Section 3.2	Water resources

21	b	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office		The draft EA indicates the majority of the CCWF2 project area is classified by the National Land Cover Dataset as "herbaceous" with 52.4% of project area falling in that landcover category, in addition to another 1.9% classified as "hay/pasture". These areas provide habitat for wildlife. Similar to adjustments in turbine locations made for wetlands, we recommend doing the same to avoid grassland habitats, particularly native grasslands (of which 33.1 acres will be either temporarily or permanently impacted) during the construction of CCWF2. Our first and foremost recommendation for all wind farms in South Dakota is to place infrastructure in disturbed areas (such as cropland) as much as possible. This recommendation includes the use of existing roads when moving heavy equipment like the crane used to install turbines that may require leveling of the landscape and result in crushing of wildlife/vegetation and soil compaction.	CCWF2 has taken vegetation, including native grasslands, into consideration when designing the Project Layout and utilized previously disturbed areas, where feasible in consideration of other siting constraints as outlined in Table 2.1-2. While approximately 54.3% of the Project Area contains land categorized as herbaceous and hay/pasture, when considering the Project footprint as a whole, only 25% of permanent impacts would be to these land cover types (23% and 2%, respectively, see Table 3.3-4). Previously disturbed land types, including cultivated crops and developed lands, represent 75% of the permanent footprint. This can also be seen in impacts to native grassland, in which the Project Area contains 42.6% unbroken sod (Table 3.3-2), and only 3% of the operational footprint would result in the permanent loss of unbroken sod (Section 3.3.2.2). CCWF2 has followed recommendations from agencies and no turbines have been sited on native grasslands (unbroken sod).	Section 3.3	Vegetation and Land Cover
21	c	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office		In the final EA, we recommend identifying those species of habitat fragmentation concern observed at the CCWF2. These and other species of birds are known to exhibit avoidance of wind turbines and/or adverse effects from landscape fragmentation.	Species of habitat fragmentation concern and potential impacts are addressed in Sections 3.4.1.2 and 3.4.2.2 of the Final EA	Section 3.4	Wildlife Resources
21	d	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office		The draft EA cites Shaffer et al. (2019); a publication/methodology to estimate the avian displacement effects at wind farms. Please also note that a tutorial exists for this method that is not cited in the draft EA (Shaffer et al. 2022). The draft EA indicates the CCWF2 would indirectly cause displacement impacts on approximately 320 acres of grasslands yet does not propose means to reduce or offset this impact using the Shaffer et al. (2019) methods. Population decline among grassland nesting birds is greater than for any avian groups reliant on any other biomes in North America (Rosenberg et al. 2019). We encourage no net loss of grassland habitats. While the draft EA acknowledges and quantifies these impacts, we recommend additional steps be taken to further avoid grasslands during construction and infrastructure placement, and then to develop compensatory offsets for remaining unavoidable habitat loss/degradation using the Shaffer et al. 2019 methods. The final EA should include methods to avoid, minimize, and finally compensate for these habitat/avian impacts and a commitment and means to implement the plans.	Section 3.4.2 of the Final EA addresses the potential impacts to grassland birds. Under the UGP PEIS, CCWF2 has agreed to mitigate the acreage of wetlands that are potentially suitable migratory stopover habitat within 0.5 miles of proposed turbines and alternate turbines, which would entail 133.6 acres of compensatory mitigation. This mitigation is also expected to provide habitat for grassland birds.	Section 3.4	Wildlife Resources
21	e	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office		Observations of three bald eagles and one golden eagle are reported in the draft EA, as well as a nearby bald eagle nest, however, the collision mortality risk to eagles is characterized as low. The draft EA also states that the developer is evaluating eagle use at the site to determine the potential for mortality to acquire take coverage if necessary. Note that the Campbell County Wind Farm (predecessor to CCWF2, located adjacent to this proposed facility) was the site of a golden eagle mortality within months of beginning its operations. Given that history, and the likely similar eagle use at the proposed CCWF2, the USFWS recommends acquiring an eagle take permit for this facility and making that commitment in the final EA. More information may be found here: https://www.fws.gov/program/eagle_management/eagle-incidental-take-wind-energy-permits .	Section 3.4.2 of the Final EA addresses the potential impacts to eagles. No eagles were detected during 223 hours of standardized surveys completed at Campbell County Wind Farm 2, and no known concentrated prey resources for eagles within the Project area. Three eagles were seen incidentally outside of standardized surveys, including two bald eagles and one golden eagle. CCWF2 will continue to coordinate with USFWS during planned post-construction monitoring efforts as it relates to eagles.	Section 3.4	Wildlife Resources
21	f	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office		The draft EA states: "...the preferred species-specific guidance from the UGP Wind Programmatic Biological Assessment is avoidance of all infrastructure < 0.5 mi of wetlands that provide potentially suitable habitat." However, that statement is followed by: "Since Proposed Project turbines will be located in this buffer, CCWF2 has elected to complete the species-specific minimization measure, which allows for the acreage of suitable wetlands located < 0.5 mi of turbines to be offset." This selection of offsets by the developer appears to misinterpret the intent and direction of the PEIS which first and foremost directs developers to identify suitable stopover habitat for the whooping crane and avoid it by at least 1 mile. The PEIS conservation measure states: "Do not site turbines, transmission lines, access roads, or other project facilities within 1 mi (1.6 km) of wetlands that provide suitable stopover habitat." It is not clear in the draft EA that efforts have been made to comply with this avoidance requirement. If such efforts have been made, this should be clarified in the final EA. If no effort has been made, we recommend additional analysis of infrastructure placement at CCWF2 in the context of whooping crane suitable habitat and implementation of avoidance measures to the maximum extent possible.	As described in Sections 3.2.1.1 and 3.5.1.1 of the Final EA, potential wetland habitat that is suitable for whooping cranes is abundant within the Project Area (up to 406 acres of NWI-mapped wetlands). Given the large amount of potential suitable habitat, as well as the siting constraints outlined in Table 2.1-2, siting turbines one mile away from potential suitable habitat was not feasible. This has been clarified in Section 3.5.2.2 of the Final EA.	Section 3.5	Threatened and Endangered Species
21	g	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office		Page 55 also includes quantification of suitable habitat within 0.5 miles of turbines: 133.6 acres. If avoidance of habitat by infrastructure cannot be achieved by at least 1 mile, inclusion of details regarding the means to offset the loss/degradation of suitable whooping crane habitat should be provided in the final EA.	CCWF2 has entered into an agreement with South Dakota Chapter of Ducks Unlimited to establish the offsets for 133.6 acres of potential suitable whooping crane habitat. This has been clarified in Section 3.5.2.2 of the Final EA.	Section 3.5	Threatened and Endangered Species
21	h	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office		Page 56 of the draft EA states that "Operational monitoring would be conducted during whooping crane migration seasons. Operations staff would be trained to identify whooping cranes, and turbines within 2.0 mi of whooping cranes would be shut down until the whooping cranes moved on naturally, as per the Proposed Project's whooping crane operational contingency plan". Monitoring is identified in the PEIS as a requirement; however, we submit that the proposed contingency plan for CCWF2 is not a monitoring plan. While some active searches are proposed, it appears these are limited to periods of inclement weather, and it is not clear that searches can or will occur outside the project boundary, although procedures call for action if cranes are spotted 2 miles from turbines. Mornings and evenings are when whooping cranes may be detected at overnight roosts and searches of suitable habitats should be conducted regardless of inclement weather during those times. Note that the birds may roost at a location multiple nights, thus located birds should be observed, from a distance so as not to disturb them, to determine whether turbine shutdowns are appropriate and/or whether/when the birds have left the area permanently.	An updated Whooping Crane Monitoring Plan has been included in Appendix G of the Final EA and addressed in Section 3.5.2.2.	Section 3.5	Threatened and Endangered Species

21	i	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office ATTN: Christopher Swanson	U.S. Fish and Wildlife Service (USFWS) South Dakota Ecological Services Field Office		While known occupied summer habitat may not exist for the northern long-eared bat at the CCWF2 project area, the species is known to occur in forested habitat along the Missouri River in South Dakota where it had been documented historically as a relatively common species. The draft EA indicates the nearest known hibernacula occur in the Black Hills of South Dakota, 180 miles from the CCWF2. However, note that a hibernaculum has recently been detected along the Missouri River (White et al. 2020) near the Nebraska/South Dakota border. While additional Missouri River hibernacula have not yet been located (nor have searches been conducted) near the CCWF2, we recommend the final EA acknowledge the potential for suitable overwintering habitat for northern long-eared bats along the river.	Thank you for your comment. This information has been incorporated into the Final EA.	Section 3.5	Threatened and Endangered Species
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