

1-6) What other sites considered for this project?

An initial evaluation of the transmission system was conducted to determine where to cost effectively connect new generation in South Dakota. In addition to the considerations outlined in Section 9.0 of the application and the discussion in 1-5, the Project Area was selected following a review of the surrounding land use and regional constraints. Other wind development was underway north of the Project Area, south of the Project Area was eliminated due to uninterested landowners and proximity to the Clark airport, and land to the east and west of the Project Area was not considered due to the lower wind resource and existing leases with other companies. A regional environmental analysis included a review of threatened and endangered species, critical and large areas of intact habitat, and land cover and the density of state and federal lands including USFWS managed easements. All of these considerations were evaluated prior to moving the Project forward.

2-11) Referring to section 9.0 of the application and pursuant to ARSD 20:10:22:12, please include:

- a. How the general criteria used to select alternative sites as identified in Section 9.1 were measured and weighed;**

Refer to the response of question 1-6 of the PUC staff's first set of data requests to Crocker Wind Farm, LLC.

- b. The reasons for selecting the criteria;**

The criteria was selected based on industry standard practices for site selection and from the USFWS Land Based Wind Energy Guidelines and Eagle Conservation Plan Guidance for environmental considerations.

- c. An evaluation of alternative sites considered by the applicant for the facility; and**

Refer to the response of question 1-6 of the PUC staff's first set of data requests to Crocker Wind Farm, LLC.

- d. An evaluation of the proposed plant, wind energy, or transmission site and its advantages over other alternative sites considered by the applicant.**

Refer to Section 9.0 of the application and the response of question 1-6 of the PUC staff's first set of data requests to Crocker Wind Farm, LLC.

2-35) Since the Day County Wind Energy Center is directly northwest and Oak Tree Wind Farm is directly southeast of the project, please provide an analysis of any cumulative impacts “to the health and welfare of human, plant and animal communities which may be cumulative or synergistic consequences of siting the proposed facility in combination with any operating conversion facilities, existing or under construction.” (ARSD 20:10:22:13).

The construction and operation of Crocker, in combination with the Oak Tree Wind Farm (located approximately 3.5 miles southeast of Crocker), as well as other private and public development is not anticipated to adversely impact the health and welfare of humans or plant and animal communities. Implementation of Best Management Practices (BMPs) and conservation measures will minimize potential impacts of the Project on all resources.

- 4-9) Referring to Section 9.1 of the Application, under the bullet labeled “Environmental Considerations,” it is stated that “[b]efore selecting the Project Area Crocker assessed multiple sites in the region from environmental and cultural perspectives” and that “Crocker selected the Project Area in part because it offered relatively low environmental impacts.”**
- a) Please identify each of the assessed multiple sites in the region (also known as alternative sites).**
 - b) Please provide a summary of each of the alternative sites.**
 - c) Please include an explanation as to why each of the alternative sites were not ultimately chosen for the Crocker wind farm.**
 - d) Please provide a summary of the potential environmental and cultural impacts of those alternative sites, which then helped form the conclusion that the proposed Project Area has relatively low environmental impacts.**

Melissa Schmit: Please see Crocker’s discussion in 4-11 for a response that satisfies these questions.

4-11) Does the Application include a description of alternative sites considered for the transmission line pursuant to ARSD 20:10:22:12? If yes, please identify where in the application this information is provided. If no, please provide the required information and ensure that all the information required by ARSD 20:10:22:12 is included.

Melissa Schmit: The application includes an analysis done consistent with the USFWS Land Based Wind Energy Guidelines (WEGs) which guides an evaluation of the landscape. This landscape level analysis creates an alternative in the sense that the site could be located anywhere within the area. Once we identify an area we begin to identify willing landowners who's participation further narrows our site. In this sense there is a full alternatives analysis that allows the wind project to still meet its other needs. The concept of discreet alternate sites does not suit the siting of wind farms (and their associate generation tie transmission lines) as well since they are typically linked to a specific interconnection point. The regional analysis as a substitute for discrete site alternatives was developed in the WEGs was done through extensive consultation and coordination between industry and the USFWS as well as state and regional (including Environmental NGOs) partners.

- 4-18) Referring to Crocker’s response to Staff DR2-35, would Crocker agree that ARSD 20:10:22:13 requires “the environmental effects shall be calculated to reveal and assess demonstrated or suspected hazards to the health and welfare of human, plant and animal communities which may be cumulative or synergistic consequences of siting the proposed facility in combination with any operating energy conversion facilities, existing or under construction?”**
- a) If yes, please explain where the assessment of cumulative or synergistic impacts as described in the rule is included in the application. If not included in the application, please include in the response to this question.**
 - b) If no, please explain why this information does not need to be included in the Application.**

Melissa Schmit: These cumulative impacts are provided throughout the application, particularly discussed in the sections covering the impacts associated with the project.