



SOUTH DAKOTA DEPARTMENT OF GAME, FISH AND PARKS

523 EAST CAPITOL AVENUE | PIERRE, SD 57501

November 13, 2018

Anne-Marie Griger
RES Americas
330 2nd Avenue South, Suite 820
Minneapolis, MN 55401

RE: Bitter Root 345kV Transmission Line Project
Duel County, South Dakota

Dear Anne-Marie,

The Department of Game, Fish and Parks has reviewed the above referenced project which involves the installation of new 345kV overhead electric transmission line, a collector substation and an interconnection substation, which will provide the necessary interconnection to the grid for the Bitter Root Wind Project, located in Yellow Medicine County, Minnesota.

A conference call took place on March 1, 2018 with project consultants, the South Dakota Department of Game, Fish and Parks, and the U.S. Fish and Wildlife Service. Alternative project routes were discussed that would result in a shorter transmission line, but those routes were ultimately eliminated due to requirements associated with the Big Stone transmission line connection location and unwilling landowners. South Dakota Game, Fish and Parks provided an initial comment letter/environmental review dated March 19th, 2018 outlining considerations to include during project planning and construction (copy of previous review letter enclosed).

An e-mail update was provided on September 5th, 2018 by the project consultants and addressed to South Dakota Department of Game, Fish and Parks and the U.S. Fish and Wildlife Service. Project consultants reported that poles associated with the transmission line will be placed as close to the road right of way as permitted, and installed directly into the ground for minimal ground disturbance. All tower heights fall below 200 feet, and will not include guy lines. These design specifications should serve to reduce bird collisions with transmission line poles. The portion of the transmission line running parallel to Fish Lake will be marked with bird diverters on overhead shield wires and spaced at a maximum distance of 50 feet to reduce large bird collisions.

E-mail correspondence from RES reported the closest eagle nest to the site was 0.8 miles from the project site. Due to the location of an eagle nest within 1 mile of the transmission line, we recommend incorporating measures to prevent electrocutions and discourage nesting (Avian Power Line Interaction Committee 2006). This document is available from the Edison Institute (<http://www.aplic.org>).

A review of aerial imagery and the National Wetlands Inventory from the proposed transmission line route revealed a number of water resources (wetlands, riparian areas, small streams) in the project area. Game, Fish and Parks first recommends avoidance of these areas, followed by minimization of impacts, and finally mitigation to offset impacts.





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Based upon the information submitted via e-mail from the project consultants, we offer the following comments for your consideration during project planning and construction:

1. Disturbance to riparian areas should be kept to an absolute minimum. If riparian areas are disturbed, vegetation losses should be quantified and replaced on site.
2. In areas where disturbance to native prairie is unavoidable due to project constraints (unwilling landowners, existing transmission line connections, etc.) we recommend re-seeding with indigenous species immediately after construction.
3. A site specific erosion control plan should be made part of the project plan and implemented at the direction of the project staff.
4. If a federally or state listed species is encountered during project construction, construction activities should cease until the resource agencies are consulted.

Thank you for the opportunity to comment on this project. If you have any questions, or the project specifications change, please contact me at 605-773-6208.

Sincerely,

Hilary Meyer
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