

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE
APPLICATION OF LOOKOUT SOLAR
PARK I, LLC FOR A PERMIT OF A
SOLAR ENERGY FACILITY IN
OGLALA LAKOTA COUNTY**

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**INITIAL RESPONSE TO STAFF'S
SECOND SET OF DATA REQUESTS**

EL18-059

March 21, 2019

Below, please find Lookout Solar Park I, LLC's ("Lookout Solar" or "Company") responses to the Staff's Second Set of Data Requests regarding the Lookout Solar Project (the "Project"). Christian Bohn is responding to each of the interrogatories on behalf of Lookout Solar. Lookout Solar will supplement responses for which it currently does not have complete information.

- 2-1) Refer to Pages 6-1 and 6-2 of the Application, and the Project Timeline slide of the Public Input Hearing presentation. The Applicant states on Pages 6-1 and 6-2 of the Application, "If the Project begins construction after December 31, 2019, the tax credit would decrease to 26% or lower in later years. Consequently, a delay could force Lookout Solar to reevaluate the financial viability of the Project." Per the Public Input Hearing presentation, the Company revised start of construction from December 31, 2019, to Spring 2020. Please explain how this delay will impact the financial viability of the project.

Tax regulations allow multiple pathways for obtaining the 30% tax credit available to projects initiated prior to December 31, 2019. At this point in time, the project sponsor intends to rely upon guidance from the Internal Revenue Service under which investment in off-site fabrication during 2019 would be treated as commencement of construction. On-site construction will likely commence later, in spring 2020. The delay in commencement of on-site construction from 2019 to spring 2020 should not impact the rate of the Investment Tax Credit or the overall financial viability of the Project.

- 2-2) Refer to Page 8-3 of the Application. Please describe the energy storage facility the Applicant is considering constructing.

The energy storage facility would include multiple lithium-ion batteries that would be integrated into the solar generating facility in the Project Area. The capacity of the energy storage system will be determined based on the results of the Definitive Interconnection System Impact Studies ("DISIS") that the Southwest Power Pool is currently completing.

- 2-3) Pursuant to ARSD 20:10:22:11, please provide a map showing cemeteries, places of historical significance, transportation facilities, or other public facilities adjacent to or abutting the plant or transmission site. If there are none of these features near the site, please indicate as such.

The Level III Cultural Resources Survey identified a historic grave site that may be eligible for listing in the National Register of Historic Places. The Survey also identified portions of the Angostura Canal (a ditches and dams) that may be considered historical. A map and description of the grave site and the Angostura Canal are provided in the attached Level III Cultural Resources Survey.

- 2-4) Refer to Page 9-1 of the Application. Has the County authorized the Applicant to place the transmission line within the right of way within the County? If no, please provide the status and when the Applicant believes it will obtain County approval.

The Project has submitted an application to the occupy Custer County's right of way in County roads and expects the application to be approved at a Custer County Commissioners meeting in April 2019. The County previously approved use of the County's right of way by the Project under an earlier development plan. The pending application reflects updates in the transmission line route as well as the owner of the Project.

- 2-5) Refer to Page 16-1 of the Application. The Applicant states it "intends to pursue an ordinance from the Oglala Sioux Tribe that would authorize the Project." What is the status of the ordinance? Please explain.

The Oglala Sioux Tribe issued the attached resolution in support of the Project on May 18, 2016. The Project has continued to provide updates on the Project to the Tribe, including a meeting with the assistants to the President of the Tribe on February 5, 2019. The Project will soon begin outreach to the Tribe regarding a potential resolution that would provide further clarity on how the Project can comply with tribal ordinances and the tribal employment rights office, taxes, and jurisdictional issues.

- 2-6) Refer to Page 16-1 of the Application. The Applicant states it "intends to obtain building permits from the Oglala Sioux Tribe and Custer County." What is the status of the building permits? Please explain.

The Project has submitted applications for floodplain development and grading permits to Custer County and anticipates that the permits will be issued in April 2019. The Project is in discussions with the Tribe to identify any tribal permits or approvals required for the Project, which may include a business license and a building permit.

- 2-7) Refer to Page 19-1 of the Application. Has the Applicant identified the primary contractors performing onsite Project construction? If yes, please identify.

The Project has not yet identified the primary contractors for construction of the Project.

- 2-8) Refer to Pages 20-3 and 21-1 of the Application. On Page 20-3, the Applicant states "during construction, Lookout Solar anticipates that the Project would employ an average

of 150 workers.” On Page 21-1, the Applicant states “during construction, Lookout Solar anticipates that the Project would employ an average of 50 workers.” Does the Applicant anticipate an average of 50 or 150 workers during construction? Please clarify.

Lookout Solar estimates that up to 150 people would be employed during the construction phase of the Project.

2-9) Refer to Pages 22-1 of the Application and ARSD 20:10:22:25. Please confirm that Applicant does not have any plans for future modification or expansion of the proposed facility or construction of additional facility which the Applicant may wish to be approved in the permit.

The Project currently does not have any plans for future modification or expansion of the Project or any additional facilities for which Lookout Solar is seeking approval.

2-10) Refer to Page 23-1 of the Application, and the Project Timeline slide of the Public Input Hearing presentation. On Page 23-1 of the Application, the Applicant states it “intends for the Project to operate for approximately thirty years.” On the Project Timeline slide of the Public Input Hearing presentation, the Applicant states the operation of the project will be approximately 40 years. Is the operating life of the facility anticipated to be 30 or 40 years? Please clarify.

Lookout Solar anticipates that the Project will have a physical useful life and operate for at least 30 years and has entered into a lease option agreement and will negotiate and conclude power purchase agreements for the 30 years of operation. The Project has the option to extend the lease term for two subsequent 5-year periods (up to 40 years) which may be exercised if continuing to operate the Project is technologically and economically viable. Accordingly, the project is expected to operate for at least 30 years, and may operate up to 40 years.

2-11) Pursuant to ARSD 20:10:22:33, please provide “the amount of land irretrievably committed.”

Upon the decommissioning of the Project, the land will be restored to substantially similar condition to the state of the land prior to construction of the Project. Accordingly, no land will be irretrievably committed.

2-12) Refer to Section 24.3 of the Application.

- a) If the cables are going to be placed underground, please explain what inspections will be performed by trucks monthly?
- b) How will a visual inspection ensure that the transmission line is fully functional?
- c) How does “vegetation encroach so as to violate required clearances” on an underground transmission line?

As most of the transmission line will be underground, the majority of the transmission line will not be inspected visually or by truck. Only the portions of the transmission line that are aboveground, where they connect to the solar arrays and the substation, would be inspected. Lookout Solar plans to monitor vegetation encroachment at the solar generating facility, the substation and any aboveground stretches of transmission lines that could be affected by overgrowth.

2-13) Pursuant to ARSD 20:10:22:34, please provide a description of plans for stabilization and weed control.

During the construction of the transmission line, the Project will comply with local policies for weed control, such as cleaning vehicles and equipment arriving from areas with known invasive species and using locally sourced topsoil. Stabilization materials, such as crushed rock, will be used as needed during installation of the transmission line.

2-14) Refer to Section 25.1 of the Application. Please explain how underground transmission lines are impacted by heavy ice storms.

Ice storms are not expected to have any impact on the underground transmission line.

2-15) Pursuant to 49-41B-7, when does the Applicant anticipate the local review committee will complete its assessment and provide any formulate mitigation measures for Commission consideration?

Lookout Solar anticipates that the local review committee will submit its report to the Commission in July 2019 or sooner.

2-16) Please refer to Page 5, lines 29-30 of Mr. Steffen Steinel's pre-filed testimony. Please provide a copy of the Oglala Sioux Tribe's resolution supporting the project.

The Oglala Sioux Tribe resolution is attached. Although the owner of the Project has changed since 2016, the Project is substantially the same as when it was proposed in 2016 and the Oglala Sioux Tribe has continued to express support for the Project.

2-17) Refer to WIRCON's Presentation filed on December 17, 2018. Has WIRCON developed any solar or wind project in the United States? If yes, please provide a project listing.

Wircon has not yet completed construction on or operated a wind or solar project in the United States. However, Wircon also is developing a solar project in Texas. Wircon has extensively development experience outside of the United States, including the development of a wind farm in Ontario, Canada.

2-18) Please provide a list of any known private landowner concerns and the Applicant's plan to address those concerns.

At public meetings on the scoping for the Environmental Assessment to comply with the requirements of the National Environmental Policy Act (“NEPA”), a few private landowners raised concerns regarding the Project’s impacts to roads and whether the Project will generate excessive dust during construction. Another concern raised by landowners was whether existing utilities in the Custer County right of way will be damaged during construction. The Project plans to restore roads to a pre-construction state at the end of construction. The Project intends to implement dust control measures, such as dewatering, during construction. The Project also is working with local utilities to obtain as-built diagrams of existing utilities and water lines and the Project will file a request with South Dakota One Call prior to construction to have existing utility lines and water lines marked to avoid damage to existing utility lines.

2-19) Please provide copies of agency correspondence, such as South Dakota Game, Fish, and Parks, State Historic Preservation Office, and Custer County.

Lookout Solar has attached the comments the Company received from state agencies and Custer County during the public comment period on the scoping for the NEPA review. Lookout Solar will supplement this response with any additional correspondence the Project later receives or identifies.

2-20) What is the projected average annual output of the facility in MWh? Please provide the assumed net capacity factor.

The annual output of the Project will be approximately 232,000 MWh.

2-21) Please provide the estimated annual landowner lease payments for the project.

The rent payment to the landowner of the Project Area is \$1,000 per year during the development period. The rent payment to the landowner of the Project Area is \$40 per acre once the option to lease has been executed.

2-22) Please explain the safety features of the project. For example, will the project have fencing surrounding the perimeter or security cameras?

The project will have security fencing around the perimeter of the Project Area and signs stating that trespassing is not permitted and warning signs indicating the potential danger from electrical facilities associated with the Project.

2-23) How far away is the closest residence to the edge of the solar array? Will the sound emitted from the inverters cause any noise impacts for area residents? Please explain.

At a distance of about 300 feet, Lookout Solar anticipates that the inverters will have a sound pressure level of about 45dB. This is approximately the amount of noise generated by a refrigerator. As the closest residents are more than 300 feet away, Lookout Solar does not anticipate that the Project will have any significant noise impacts on nearby residents.

2-24) Please explain whether reflection from the solar panels will cause a visual impact.

Glare and glint are not concerns with modern solar panels, as the U.S. Department of Energy has noted in its guidance. See Department of Energy, Solar PV and Glare Factsheet, <https://www.energy.gov/eere/solar/downloads/solar-pv-and-glare-factsheet>. This has allowed solar projects to be built in areas where glare and glint are a concern, like near airports. See Solar Power World, 7 Cool Solar Installations at U.S. Airports, <https://www.solarpowerworldonline.com/2016/03/7-cool-solar-installations-at-u-s-airports/>.

Dated this 21st Day of March 2019.

Christian Bohn
CFO Lookout Solar Park I, LLC

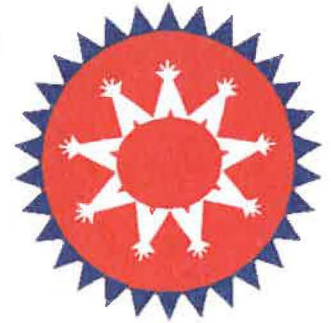


Julian Bear Runner

Oglala Sioux Tribe

Office of the President

P.O. Box #2070
Pine Ridge, South Dakota 57770
1(605) 867-5821 Ext. 8420 (O) / 1(605) 867-6076 (F)



February 27, 2019

Frank Rapp
Lookouts Alternative Energy, LLC
157 BIA 2
Buffalo Gap, SD 57722

Lynn Rapp
Lookouts Alternative Energy, LLC
103 Oak Street
Buffalo Gap, SD 57722

RE: Letter of Continued Support - Lookouts Solar Park Project

This serves as a letter of continued support for your efforts with the "Lookouts Solar Project", based on prior Oglala Sioux Tribal Council Resolution No. 16-50 initial support.

In my absence, thank you for providing a brief presentation to my staff on February 5, 2019, along with your partners from WIRCON in my office. As well, for your follow up telephone call on February 15th requesting my letter of support, and indicating that you would be meeting with the Tribal Rural Water Supply System and/or Tribal Water Resources Department regarding any necessary water use permits for the construction portion of your project. As well, you indicated that after the project is complete, water permits will be obtained for water use for solar panel cleaning purposes only, subject to water use permit requirements.

During the February 5th meeting with my staff, there were several ideas mentioned, in addition to your project we'd invite you to participate in, one being a Tribal Renewable Energy Summit that I'd like to promote as one of my Presidential Initiatives. We'd like to showcase new technologies in this industry, successful initiatives currently implemented by other Tribes, as well as highlight the process of getting projects into operation such as yours onto the Pine Ridge Reservation. Secondly, with this effort I want to demonstrate my wholehearted support for the "Green New Deal" initiative! I will be making my formal support of this effort to the public as well.

As I understand your particular project, it is located on 840 acres of allotted trust land owned by Lois Wilson Rapp, located within the exterior boundaries of the Pine Ridge Reservation. Your company, entitled "*Look Outs Alternative Energy, LLC*" initially presented your project to the Oglala Sioux Tribe Economic and Business Development (EB&D) Committee on April 8, 2016. The EB&D Committee heard the presentation provided by the both of you related to your company, in which you requested a Resolution from the Oglala Sioux Tribal Council in support. As well, the EB&D Committee considered the information submitted at that time and forwarded the matter onto the full Tribal Council for action. Tribal Council determined that this project is in the best interest of the Oglala Sioux Tribe and its Members, thus approving Tribal Council Resolution No. 16-50.

Page 2 of 2

Look Outs Solar Project continued support

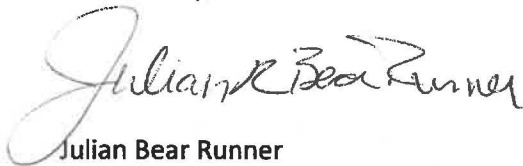
Moreover, during the February 5th meeting you mentioned you have had the support of the last two (2) Tribal Administrations, though we do not have a record of this on file in our office, we ask that you please provide any/all pertinent information as soon as possible regarding this support you mentioned. Additionally, our office just received a February 19, 2019 notice from the South Dakota Public Utilities Commission regarding *EL18-059 – In the Matter of the Application of Lookout Solar Park I, LLC for a Permit of a Solar Energy Facility in Oglala Lakota County.*

I remain confident that your project will help others along their way in seeking to promote renewable energy on the Pine Ridge Reservation. I would like to see our Tribe convert the decaying fossil fuel economy into a new, green economy that is environmentally sustainable, economically secure and socially just, for the ultimate betterment of our future generations.

In closing, I trust that you will report back to my office on all matters involving your project. This will help keep me and the Tribal Council apprised of any/all developments. Please confirm with my office that you have indeed received the proper water use permits for your project upon receipt. Additionally, Tribal Council or I may request periodic reports on the progress of your project, so please be prepared to provide that as needed.

Should you have any questions or concerns please feel free to contact the office at (605) 867-8487. Wopila!

Respectfully,

A handwritten signature in cursive script that reads "Julian Bear Runner". The signature is written in black ink and is positioned above the printed name and title.

Julian Bear Runner
President, Oglala Sioux Tribe

CC: Jennifer Spotted Bear, Secretary, Oglala Sioux Tribe
File

RESOLUTION OF THE OGLALA SIOUX TRIBAL COUNCIL
OF THE OGLALA SIOUX TRIBE
(AN UNINCORPORATED TRIBE)

RESOLUTION OF THE TRIBAL COUNCIL OF THE OGLALA SIOUX TRIBE IN SUPPORT OF LOOK OUTS SOLAR PROJECT TO BE LOCATED ON INDIVIDUAL INDIAN TRUST LAND OWNED BY LOIS WILSON RAPP.

WHEREAS, the Oglala Sioux Tribe organized in accordance with Section 16 of the Indian Reorganization Act of 1934 on December 14, 1935 by adopting a federally approved Constitution and By-laws, and the Tribal Council is the governing body of the Tribe, and

WHEREAS, the Tribal Constitution authorizes the Oglala Sioux Tribal Council, in Article IV, Section 1(f) to manage all economic affairs of the Tribe, and in Section in Section 1(x) to manage and protect Tribal lands, and

WHEREAS, Article IV, Section 1(t) of the Constitution gives the Tribal Council the power to delegate its enumerated powers to subordinate boards or officers, reserving the right to review their actions taken by virtue of such delegated power, and

WHEREAS, the Economic and Business Development Committee is a standing committee of the Oglala Sioux Tribal Council and has been delegated the power to oversee all matters relating to economic development on behalf of the Oglala Sioux Tribe, and

WHEREAS, on April 8, 2016, members of the Economic and Business Development Committee heard a presentation by Frank Rapp and Lynn Rapp related to their company, "Look Outs Alternative Energy LLC," and their plans to pursue the Look Outs Solar Project to be located on 840 acres of allotted land owned by Lois Wilson Rapp, all as described in the attached documents (herein, the "Project"), and

WHEREAS, the Rapps requested a Resolution from the Tribal Council in support of the Project, and

WHEREAS, the Economic and Business Development Committee considered the information submitted by the Rapps and voted to forward the issue of supporting the Project to the full Tribal Council, and

WHEREAS, the Tribal Council has considered the matter and determined that it is in the best interest of the Tribe and its members to support the Project, now

THEREFORE BE IT RESOLVED, that the Tribal Council of the Oglala Sioux Tribe supports the "Look Outs Solar Project" as described in the documents attached hereto.

RESOLUTION NO. 16-50

Page Two

C-E-R-T-I-F-I-C-A-T-I-O-N

I, as undersigned Secretary of the Oglala Sioux Tribal Council of the Oglala Sioux Tribe, hereby certify that this Resolution was adopted by the vote of: 12 For; 1 Against; 0 Abstain; 1 Not Voting; during a REGULAR SESSION held on the 18th day of MAY, 2016.

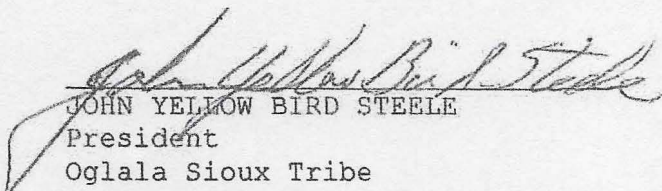


RHONDA TWO EAGLE

Secretary

Oglala Sioux Tribe

A-T-T-E-S-T:



JOHN YELLOW BIRD STEELE

President

Oglala Sioux Tribe





Department of Energy
Western Area Power Administration
Upper Great Plains Customer Service Region
P.O. Box 35800
Billings, MT 59107-5800

DEC 17 2018

B0401.BL

Dear Customers and Interested Parties:

This letter is to notify you that Western Area Power Administration (WAPA) has extended the scoping comment period for the proposed Lookout Solar Project (Project) and has scheduled an additional public meeting (open house format) for the Project. WAPA representatives will attend the meeting.

The Project would involve construction of an 840-acre photovoltaic solar generating facility. Other project components would include a new substation, a new underground transmission line, access roads, and a maintenance and operation center. The Project would be located approximately 22 miles south of Buffalo Gap, primarily on lands within the Pine Ridge Indian Reservation in Oglala Lakota and Custer Counties, South Dakota (see enclosed map).

The Project would interconnect with WAPA's New Underwood to Wayside 230-kilovolt Transmission Line. As a result, WAPA will provide Federal oversight of the preparation of an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA). The EA will evaluate the environmental effects of the proposed Project on resources such as wetlands, vegetation and wildlife, cultural and recreation resources, as well as other social, economic, and environmental effects.

The scoping period provides an opportunity for the general public, government agencies, and tribal governments to identify issues and alternatives that will help WAPA define the scope of the EA. The additional public scoping meeting (open house format) will be held to provide an opportunity for interested parties to discuss the Project with Federal agency resource specialists and to submit comments. The meeting will be held on Wednesday, January 16, 2019, from 5:00 p.m. to 7:00 p.m., at the Hot Springs Public Library.

Comments may be submitted in the following ways:

- By mail to:
Western Area Power Administration
Attn: Ms. Christina Gomer
2900 4th Avenue North
Billings, MT 59101
- By fax to (406) 255-2900
- By email to gomer@wapa.gov
- In writing at the public scoping open house meeting:
Wednesday, January 16th, 2019
5:00 p.m. to 7:00 p.m.
Hot Springs Public Library
2005 Library Drive
Hot Springs, SD 57747

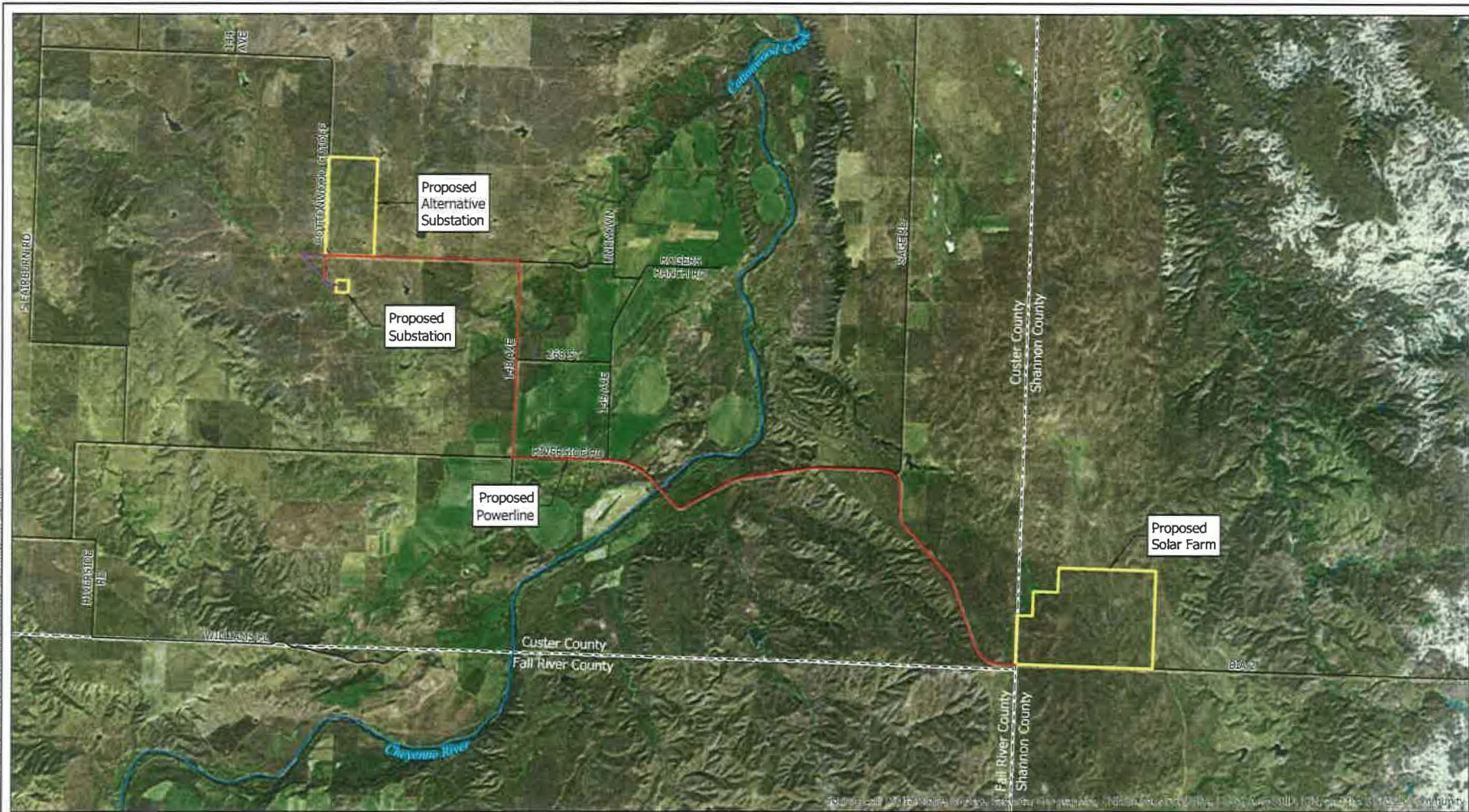
For your input to be considered during preparation of the draft EA, WAPA requests comments no later than Tuesday, February 19, 2019. If you have any questions, or need more information about the Project, please contact WAPA using the methods listed above. Thank you for your time and interest in the Project.

Sincerely,



Christina Gomer
NEPA Coordinator


Enclosure



EXPLANATION

- POWERLINE
- PROPOSED ACCESS ROAD
- PROPERTY BOUNDARIES



 <p>Tribydro CORPORATION 1000 Commercial Drive Laramie, WY 82072 www.tribydro.com (307) 425-7474 (F) 307-745-7729</p>	FIGURE 3
	PROJECT OVERVIEW
	LOOKOUT SOLAR PARK I, LLC CUSTER COUNTY, SOUTH DAKOTA
Drawn By: BR Checked By: ES Scale: 1" = 1 Mile Date: 12/20/17 File: Lookout_Solar_Park.aprx	

From: [Gomer, Christina](#)
To: "[Meyer, Hilary](#)"
Subject: RE: [EXTERNAL] Lookout Solar Project South West South Dakota
Date: Thursday, December 27, 2018 1:52:00 PM
Attachments: [Project Areas.zip](#)

Good afternoon Hilary,

Thank you for your interest in the project.

To answer your questions:

1. Do you have any shape files that you might be able to share with more specific project boundaries? **Yes. Please see attached.**
2. In the PUC application, it looks like there was an Environmental Assessment completed in Summer 2016 for the proposed project. This was completed by the Bureau of Indian Affairs, and they issued a FONSI. Why is there a second EA being conducted for this project? **The BIA's EA did not fully describe the Proposed Action. The BIA document only covered the portions of the project which are to be located on the Pine Ridge Reservation. The transmission line and WAPA's federal action (to allow the interconnection) was not described in the BIA's EA. Also, the Forest Service may have a Federal action (issuing an easement or special use permit), which was not described in the BIA's document. The BIA does not intend to amend or modify their 2016 EA, so WAPA and the Forest Service are preparing a second EA to fully evaluate the project and our respective Federal actions.**
3. What was the reasoning for the extended deadline in the scoping notice? **President Trump directed all Federal agencies to close for business on Wednesday, December 5th, as a day of mourning for the late President Bush. As such, neither WAPA or Forest Service representatives were able to attend the December 5th public meeting. WAPA has extended the scoping deadline and scheduled an additional public meeting so that interested parties can meet with Federal agency representatives.**

Please let me know if you'd like to discuss further. Thank you again,

-Christina

Christina Gomer | NEPA Coordinator

Western Area Power Administration | Upper Great Plains Region | Billings, MT

(O) 406.255.2811 | gomer@wapa.gov



From: Meyer, Hilary [mailto:Hilary.Meyer@state.sd.us]

Sent: Wednesday, December 26, 2018 12:12 PM

To: Gomer, Christina <Gomer@WAPA.GOV>

Subject: [EXTERNAL] Lookout Solar Project South West South Dakota

Hello Christina-

I received a WAPA scoping notice for the proposed solar project on the Pine Ridge Indian Reservation in South Dakota. I have been going through the information you sent, and some of the information that has been submitted to the South Dakota Public Utilities Commission for the permit for this solar facility. I have a couple questions for you:

1. Do you have any shape files that you might be able to share with more specific project boundaries?
2. In the PUC application, it looks like there was an Environmental Assessment completed in Summer 2016 for the proposed project. This was completed by the Bureau of Indian Affairs, and they issued a FONSI. Why is there a second EA being conducted for this project?
3. What was the reasoning for the extended deadline in the scoping notice?

If it is easier for you, feel free to contact me at my office number below. I will be in until 2pm Today 12/26. We are under a winter storm warning right now, and there is a good chance state offices will be closed tomorrow due to blizzard conditions, so I may not be in the office tomorrow. I will be in on Friday 12/28 from 8am-4pm central time (also depending on road conditions Friday morning).

Thank you.

Hilary Meyer | Environmental Review Senior Biologist
South Dakota Game, Fish and Parks
523 East Capitol Avenue | Pierre, SD 57501
605.773.6208 | Hilary.Meyer@state.sd.us





SOUTH DAKOTA DEPARTMENT OF GAME, FISH AND PARKS

523 EAST CAPITOL AVENUE | PIERRE, SD 57501

February 11, 2019

Christina Gomer
Western Area Power Administration
2900 4th Avenue North
Billings, MT 59101

RE: Proposed Lookout Solar Project

Dear Christina,

Thank you for contacting the South Dakota Department of Game, Fish and Parks (SDGFP) regarding the above-mentioned project involving the construction of an 840 acre photovoltaic solar generating facility, a new substation, a new underground transmission line, access roads and a maintenance and operation center in Ogalala Lakota and Custer Counties, South Dakota. The scoping notice did not include sufficient detail to determine environmental impacts of this project. However, SDGFP accessed the developers application materials sent to the South Dakota Public Utilities Commission to complete our review. We have prepared the following comments and suggestions to be considered as part of the draft environmental assessment (EA) to be prepared by Western Area Power Administration.

Siting and operation of solar projects has the potential to directly and indirectly impact area wildlife. This may occur by altering habitats, influencing behavior patterns and directly killing individuals through collisions with project infrastructure. In particular, SDGFP is concerned about collision mortality of birds and bats in the project area (Harrison et al. 2016, Walston et al. 2016). Lookout Solar LLC (the developer) conducted one year of pre-construction wildlife surveys at the project site. If major impacts are predicted from these studies, development in the area should be avoided. If less serious impacts are anticipated, mitigation is recommended to reduce these impacts. Post-construction studies should be conducted to assess actual impacts of the project, evaluate mitigation effectiveness and evaluate predictions. Very little research exists on the impacts of solar energy facilities sited in grassland and herbaceous habitat. We recommend the developer follow the methods described in Huso et al. (2016) for mortality monitoring at utility-scale solar facilities. Information on efforts to survey for and document sensitive species and habitats, as well as how risk will be avoided or mitigated should be included in the EA. We also recommend the developers contact the U.S. Fish and Wildlife Service ecological services field office for consultation to determine any potential impacts to federally threatened or endangered species, if they have not done so already:

South Dakota Ecological Services Field Office
420 S. Garfield Avenue
Suite 400
Pierre, SD 57501
Phone: (605) 224-8693
Fax: (605) 224-9974

Landcover and Landuse

A desktop review of the project indicated that most of the proposed area is classified as grassland/herbaceous cover with a small portion of the area classified as shrub/scrub in the 2011 National Land Cover Database (<https://www.mrlc.gov/>). The Natural Resources Conservation Service identifies this major land resource area as mixed sandy and silty tableland and badlands. This area is dominated by grasslands and shrublands. Remnant prairie tracts have high conservation value, especially those that contain a high diversity of both plant and animal species, and rare or non-existent invasive species. We acknowledge this area is likely comprised of primarily untilled native grasslands and impacts to these habitats may be unavoidable, but would still recommend the project area be surveyed for untilled tracts of native prairie and recommend efforts taken not to place solar panels, roads, collection lines and facilities in these areas. The project area does contain large areas of un-fragmented land, indicating the potential for high quality wildlife habitat. The EA should provide information on the extent of grassland in the area, ways to avoid direct loss of grassland acres and ways to reduce degradation and fragmentation.

Additionally, mixed sandy and silty tablelands and badlands are susceptible to wind and water erosion. South Dakota Game, Fish and Parks recommends implementing erosion control measures during the construction phase of the project, to reduce impacts of sedimentation to ground and surface waters. Additionally, the proposed underground transmission line will run under the Cheyenne River. Disturbance to riparian and wetland areas should be kept to an absolute minimum. If riparian vegetation is lost, it should be quantified and replaced on site. Seeding of indigenous species should be accomplished immediately after construction to reduce sedimentation and erosion.

Rare and Protected Species

We have conducted a search of the SD Natural Heritage Database (NHD) for the above referenced project. This database monitors species at risk, specifically those species that are legally designated as threatened or endangered or rare. Rare species are those that are declining and restricted to limited habitat or a jurisdiction, may be isolated or disjunct due to geographic or climatic factors that are classified as such due to lack of survey data. A list of monitored species can be found at <http://gfp.sd.gov/natural-heritage-program>.

Many places in South Dakota have not been surveyed for rare or protected species and the absence of a species from the database does not preclude its presence from the project area. If surveys indicate that state endangered, threatened or rare species may occur in the project area, South Dakota Codified Law 34A-8-8 allows for only limited and specific authorized take of threatened and endangered

species for scientific, zoological or educational purposes. For more information, please visit <https://gfp.sd.gov/licenses/other-permits/endangered-species-permit.aspx>.

Avian Species

In North America, grassland birds have experienced consistent and long term declines (Peterjohn and Sauer 1999). The developers included reports of one year of grassland bird studies conducted in the project area. A number of species were documented that are impacted by habitat fragmentation. Species of habitat fragmentation concern are those which research and literature indicate are negatively affected by loss and fragmentation of habitat. Fragmentation includes cutting habitats into smaller, more isolated blocks and the creation of barriers (such as the inclusion of trees in prairies, barren land in forested areas, wind turbines, roads, etc.). The effects of fragmentation on species of concern include avoidance of fragmented areas or decreased density, survival, and/or reproduction in fragmented habitats. This list was compiled by the U.S. Fish and Wildlife Service. The EA should address ways to reduce direct and indirect impacts to these species. Sensitive species present in the project area include:

- Burrowing owl (*Athene cunicularia*)
- Upland Sandpiper (*Bartramia longicauda*)
- Longbilled Curlew (*Numenius americanus*)
- Western Meadow Lark (*Sturnella neglecta*)
- Lark Bunting (*Calamospiza melanocorys*)
- Sharp-tailed grouse (*Tympanuchus phasianellus*)
- Grasshopper Sparrow (*Ammodramus savannarum*)

Additionally, a search of the NHD indicated that there is a 2011 record of a nesting burrowing owl (*Athene cunicularia*) located in a prairie dog town in the US Forest Service allotment where the proposed alternate substation is located. The burrowing owl is listed as a species of greatest conservation need in South Dakota because it relies on a unique habitat. Burrowing owls nest in grasslands with few trees, and generally inhabit prairie dog towns larger than 25 acres (Griebel and Savidge 2007, Thiele et al. 2013). The breeding season in South Dakota is mid-May to early August. South Dakota Game, Fish and Parks suggests avoiding construction within 0.25 miles of an active burrowing owl nest. These recommendations for burrowing owl nest avoidance measures should be included in the EA

Prairie Grouse

South Dakota Game, Fish and Parks generally recommends two years of prairie grouse lek surveys in a project area prior to development. Prairie grouse (sharp-tailed grouse and greater prairie chicken (*T. cupido*)) inhabit large in-tact blocks of native grassland. Development (roads, power lines, solar panels, buildings, etc.) in and around prairie grouse habitat can fragment otherwise suitable habitat and displace birds. Prairie grouse are indicators of high quality grassland habitat and a robust ecological community due to their specific habitat needs. The developers of the Lookout Solar project did not complete prairie grouse lek surveys, but they did observe sharp-tailed grouse in the project area.

South Dakota Game, Fish and Parks recommends a 1 mile setback from active sharp-tailed grouse leks. If possible, we recommend performing pre-construction lek surveys in April and May of 2019, and siting of project infrastructure 1 mile from active leks. We also suggest a two mile no construction buffer during the lekking season, 1 March to 30 June. Sharp-tail grouse are sensitive to noise, and construction near leks could cause birds to abandon leks. If the developer determines it is not feasible to cease construction within the two mile buffer during the lekking season, SDGFP asks that construction activities are limited to the period 3 hours after sunrise to 1 hour before sunset. These recommendations for sharp-tailed grouse lek avoidance measures should be included in the EA.

Migratory Bird Treaty Act

Under the Migratory Bird Treaty Act (MBTA), it is unlawful to pursue, hunt, take, capture, kill, possess, sell, purchase, barter, import, export or transport any migratory bird, or any part, nest or egg of any such bird, unless authorized under a permit issued by the Secretary of the Interior. Take is defined in regulations as: "pursue, hunt, shoot, wound, kill, trap, capture or collect or attempt to pursue, hunt, shoot, wound, kill, trap, capture or collect." A list of species protected by the MBTA can be found here: <https://www.fws.gov/birds/management/managed-species/migratory-bird-treaty-act-protected-species.php>. A number of protected species and their nests were identified by the developer during the 1 year of pre-construction wildlife surveys. Threats to species protected by the MBTA specific to the solar facility include removal of nests when clearing riparian areas of trees, collisions with above-ground power lines, electrocution from power lines and collisions with photovoltaic panels. To avoid impacts to MBTA protected species, SDGFP recommends construction activities near any documented nest should be avoided during the nesting period (March-August). Tree removal in the immediate vicinity of any nests should be avoided.

Avian Mortality and Powerlines

The developer proposes to use underground transmission lines, which will reduce impacts to avian species. We include the following information for the reviewers and developers to consider if any above-ground power lines will be a part of the project. Avian use of energized poles includes perching (for hunting and roosting), nesting, and resting (including shelter during inclement weather). Large birds (e.g. eagles, hawks) that use energized poles can be electrocuted if energized equipment is not insulated properly to minimize risks. Other avian species could potentially collide with the lines, including waterfowl, and sharp-tailed grouse, which do not generally perch on tall transmission lines. If any above-ground transmission lines are built in addition to the proposed underground transmission line, South Dakota Game, Fish and Parks recommends all new construction should follow or exceed Avian Power Line Interaction Committee (APLIC) construction design standards for avian-safe passage and use. See <https://www.aplic.org/> for specific guidance on how to mitigate collision and electrocution risks to avian species. Ways to reduce or mitigate the impacts of power line strikes and electrocutions should be provided in the EA, including the suggestions from APLIC.

Bats

The NHD search also indicated an historic record of a fringe-tailed myotis (*Myotis thysanodes*) approximately 5 miles north west of the proposed substation location. In addition, a number of other bat species were recorded in the northern portion of Badlands National Park, approximately 10 miles north of the project area. While there are no records in the NHD of bats in the immediate project area, the close proximity and similar terrain could indicate a high use area of bat activity in southwestern South Dakota.

The developers of the Lookout Solar project conducted one year of bat pre-construction acoustic monitoring. Their results verified the presence of Townsend's big-eared bat (*Corynorhinus townsendii*), big brown bat (*Eptesicus fuscus*), silver-haired bat (*Lasionycteris noctivagans*), western small-footed myotis (*Myotis ciliolabrum*), little brown bat (*M. lucifigus*), fringed myotis (*M. thysanodes*), and long-legged myotis (*M. Volans*). The fringed myotis, silver-haired bat and Townsend's big-eared bat are classified as a species of greatest conservation need in South Dakota. Bats have the potential to collide with meteorological and communication towers associated with a project, and may also be susceptible to collision with solar panels (Harrison et al. 2016). Because the risks and impacts of solar energy facilities on bats is not well understood, SDGFP recommends at least one year of post-construction bat mortality monitoring at the project during the operational phase and request copies of monitoring reports upon completion. To mitigate risks to bats during the construction phase, we recommend that the developers refrain from removing trees along riparian areas during the active period for bats (April-September). Information on bat use and potential habitat in the project area should be included in the EA. South Dakota Game, Fish and Parks also requests that the EA include plans for post-construction mortality monitoring.

Sensitive Plant Species

The search of the NHD also revealed an historic record of a large stand (~50,000 individuals) of Barr's Milkvetch (*Astragalus barrii*) in the immediate project area in Ogalala Lakota County. Barr's Milkvetch is globally ranked as very rare and local throughout its range, and is regionally endemic in southwestern South Dakota. We also found a number of records for Barr's Milkvetch within a 10 mile radius of the project area, indicating this project area likely supports a population of this rare plant species. We ask that the project avoid removing this large stand of Barr's Milkvetch if it is still present in the project area.

Mammals

Swift fox (*Vulpes velox*) are listed as state threatened by SDGFP. Swift fox typically inhabit short grass to midgrass prairies with gently rolling topography. Swift fox will enlarge burrows of other burrowing animals (e.g. black tailed prairie dogs) or create their own dens in loose soils (Higgins et al. 2000). Habitat loss is the greatest threat to swift fox populations throughout its range. No records of swift fox occur within the project area, however suitable habitat exists within the project boundary. Additionally, swift fox were reintroduced into Badlands National Park, and the surrounding area in the early 2000's (Samsal 2011). If a swift fox den is discovered during construction of the project, SDGFP

recommends avoiding construction in the immediate area (0.25 mile buffer), if feasible. Wildlife surveys completed by the developer indicate that prairie dog towns were identified in the project area by biologists during site visits. We recommend not siting project components within prairie dog colonies (if feasible) to reduce disturbance to swift fox habitat, as well as to reduce the risk of collision for avian predators that may forage in prairie dog colonies. Collisions with vehicles associated with construction, operation, and maintenance activities are also a concern if swift fox are found in the project area. Game, Fish and Parks recommends reducing speed limits within the project during construction and operation and maintenance activities. South Dakota Game, Fish and Parks requests that recommendations for avoiding risks to swift fox are included in the EA.

The project area is also home to populations of mule deer (*Odocoileus hemionus*), whitetail deer (*O. virginianus*) and antelope (*Antilocapra americana*). We do not anticipate this project to pose a significant impact to these species. However, the use of a barbed wire fence rather than a woven wire fence to exclude livestock from the project would be preferred. Adult deer can easily jump a woven wire fence, but fawns cannot, and can be left stranded. The ideal wildlife-friendly fence should be 40" or less, and the top two wires should be no less than 12" apart. Deer and antelope can easily tangle their back legs if the top wires are too close together. The bottom wire or rail should be high enough for antelope, calves and fawns to crawl under, at least 18" from the ground. Barbless wire for the top and bottom strands will prevent snagging and injuries. It is also advantageous to make the fence highly visible, not only for deer and antelope, but also for low-flying bird species such as grouse and owls. If the developers prefer to fence out livestock and wildlife from the project area, we suggest a woven wire fence 7-8' tall to exclude deer and antelope. If such practice is implemented, GFP would request to be contacted to conduct a site visit to assure big game animals are void of a fenced-in facility. The wire should be installed tight to the ground. For more information on building wildlife-friendly fencing please see: https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_026389.pdf. South Dakota Game, Fish and Parks requests that recommendations for avoiding risks to deer and antelope are included in the EA.

To better understand the project design and construction approach to assist further analysis of potential environmental impacts, we recommend the developers schedule a joint meeting with SDGFP and the U.S. Fish and Wildlife Service representatives to further discuss project details and wildlife concerns. We appreciate the opportunity to provide comments on this project. Please keep SDGFP involved in all future correspondence. For any additional questions or information, please feel free to contact me at 605.773.6208 or Hilary.Meyer@state.sd.us.

Sincerely,



Hilary Meyer
Environmental Review Senior Biologist
523 East Capitol Avenue
Pierre, SD 57501
hilary.meyer@state.sd.us

Literature Cited

- Griebel, R.L., and J.A. Savidge. 2007. Factors influencing burrowing owl reproductive performance in contiguous shortgrass prairie. *Journal of Raptor Research* 41:212-222.
- Harrison, C., H. Lloyd, and C. Field. 2016. Evidence review of the impacts of solar farms on birds, bats and general ecology. Technical report, Manchester Metropolitan University, UK.
- Huso, M., T. Dietsch, and C. Nicolai. 2016. Mortality monitoring design for utility-scale solar power facilities. U.S. Geological Survey Open-File Report 2016-1087, 44 p., <http://dx.doi.org/10.3133/ofr20161087>.
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- Samsal, I. 2011. Population viability analysis of swift fox (*Vulpes velox*) at the Badlands National Park. Master's thesis. South Dakota State University, Brookings, USA.
- Thiele, J.P., K.K. Bakker, and C.D. Dieter. 2013. Multiscale nest site selection by burrowing owls in western South Dakota. *The Wilson Journal of Ornithology* 125:763-774.
- Walston, L.J. Jr, K.E. Rollins, K.E. LaGory, K.P. Smith and S.A. Meyers. 2016. A preliminary assessment of avian mortality at utility-scale solar energy facilities in the United States. *Renewable energy* 92:405-414.



DEPARTMENT of ENVIRONMENT
and NATURAL RESOURCES

JOE FOSS BUILDING
523 EAST CAPITOL
PIERRE, SOUTH DAKOTA 57501-3182

denr.sd.gov

December 17, 2018

Western Area Power Administration
Attn: Ms. Christina Gomer
2900 4th Avenue North
Billings, MT 59101

RE: Lookout Solar Project – Oglala Lakota and Custer Counties, South Dakota

The South Dakota Department of Environment and Natural Resources (DENR) Surface Water Quality Program has reviewed the proposed Lookout Solar Project in Oglala Lakota and Custer Counties. The DENR finds that this construction, using conventional construction techniques, should not cause violation of any statutes or regulations administered by the DENR based on the following comments:

1. At a minimum and regardless of project size, appropriate erosion and sediment control measures must be installed to control the discharge of pollutants from the construction site. Any construction activity that disturbs an area of one or more acres of land must have authorization under the General Permit for Storm Water Discharges Associated with Construction Activities. Contact the Department of Environment and Natural Resources for additional information or guidance at 1-800-SDSTORM (800-737-8676) or <http://denr.sd.gov/des/sw/StormWaterandConstruction.aspx>.
2. A Surface Water Discharge (SWD) permit may be required if any construction dewatering should occur as a result of this project. Please contact this office for more information.
3. Impacts to tributaries and wetlands should be avoided or minimized if possible. These water bodies are considered waters of the state and are protected under the South Dakota Surface Water Quality Standards. The discharge of pollutants from any source, including indiscriminate use of fill material, may not cause destruction or impairment except where authorized under Section 404 of the Federal Water Pollution Control Act. Please contact the U.S. Army Corps of Engineers concerning these permits.

This office requests the opportunity to review and comment on any significant changes that may be proposed before the project is completed. Thank you for the opportunity to comment on the proposed project. If you have any questions, please contact me at 605-773-3351 or Shannon.Minerich@state.sd.us.

Sincerely,

Shannon Minerich
Environmental Scientist
Surface Water Quality Program

From: [Minerich, Shannon](#)
To: [Gomer, Christina](#)
Subject: [EXTERNAL] Lookout Solar Project
Date: Monday, December 17, 2018 6:55:06 AM
Attachments: [WAPA - Lookout Solar Project_DENRresponse.pdf](#)

Hi Christina - Please find the attached letter regarding the Lookout Solar Project. Thanks! shannon



United States
Department of
Agriculture

Farm
Production
And
Conservation

Farm
Service
Agency

SD State FSA Office
200 4th St SW Fed Bldg
Huron SD 57350
PH: 605/352-1160
Fax: 855-243-6003

November 26, 2018

Western Area Power Administration
Attn: Ms. Christina Gomer
2900 4th Ave. North
Billings, MT 59101

Dear Ms. Gomer,

Thank you for the opportunity to comment on the project information involving the proposed construction of the Lookout Solar Project located in Oglala Lakota and Custer Counties in South Dakota. As a Federal nexus, the Farm Service Agency (FSA) is requesting more detail of the project area in order to determine if any of our producers may be affected. If there is a shapefile that you would be able to share with us, we can make a determination on what interest we have in the project prior to the completion of your EA.

Again, we appreciate the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Paul Shubeck". The signature is written in a cursive style with a long, sweeping underline.

Paul Shubeck
State Executive Director

sl

From: [Littlefield, Steven - FSA, Huron, SD](#)
To: [Gomer, Christina](#)
Subject: [EXTERNAL] Lookout Solar Project - Farm Service Agency response
Date: Thursday, December 06, 2018 11:51:48 AM
Attachments: [FSA LookoutSolarProject.pdf](#)

Hi Ms. Gomer,

Thank you for including Farm Service Agency in your scoping for the Lookout Solar Project. As a federal nexus, the Farm Service Agency (FSA) is requesting more detail of the project area to determine if any of our producers may be affected. If there is a shapefile that you could share with us, we can make a determination on what interest we have in the project prior to the completion of your EA.

Sincerely,
Steven Littlefield

Agricultural Program Specialist
State Environmental Coordinator
FSA SD State Office
200 4th St. SW Federal Bldg Room 308
Huron, SD 57350
Phone: (605) 352-1183
Fax: 855-243-6003

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From: [Gomer, Christina](#)
To: "[Littlefield, Steven - FSA, Huron, SD](#)"
Subject: RE: [EXTERNAL] Lookout Solar Project - Farm Service Agency response
Date: Thursday, January 3, 2019 11:14:00 AM
Attachments: [Project Areas.zip](#)

Good afternoon Steven,

Attached are the Project shapefiles. Please let me know if there is anything else I can do.

Thanks,
-Christina

Christina Gomer | NEPA Coordinator

Western Area Power Administration | Upper Great Plains Region | Billings, MT
(O) 406.255.2811 | gomer@wapa.gov



From: Littlefield, Steven - FSA, Huron, SD [mailto:steven.littlefield@sd.usda.gov]
Sent: Thursday, December 6, 2018 11:52 AM
To: Gomer, Christina <Gomer@WAPA.GOV>
Subject: [EXTERNAL] Lookout Solar Project - Farm Service Agency response

Hi Ms. Gomer,

Thank you for including Farm Service Agency in your scoping for the Lookout Solar Project. As a federal nexus, the Farm Service Agency (FSA) is requesting more detail of the project area to determine if any of our producers may be affected. If there is a shapefile that you could share with us, we can make a determination on what interest we have in the project prior to the completion of your EA.

Sincerely,

Steven Littlefield

Agricultural Program Specialist
State Environmental Coordinator
FSA SD State Office
200 4th St. SW Federal Bldg Room 308
Huron, SD 57350
Phone: (605) 352-1183
Fax: 855-243-6003

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From: [Bessken, Charlene](#)
To: [Gomer, Christina](#)
Subject: [EXTERNAL] Lookout Solar Project
Date: Thursday, December 06, 2018 8:49:07 AM

I received your letter to notify people about this project. Is this your request to initiate Section 7 consultation or will you do that at a later date? You can get listed species information for this site:

<https://ecos.fws.gov/ipac/>

--

Charlene "Charlie" Bessken
TWS Certified Wildlife Biologist
Fish and Wildlife Biologist
USFWS South Dakota Field Office
420 South Garfield Avenue, Suite 400
Pierre, SD 57501
(605) 224-8693 ext. 231
Fax (605) 224-9974
www.fws.gov/southdakotafieldoffice

My weekly schedule is M-Th - 6:30 am to 5:00 pm CST/CDT

M. Winegar
220 Walker St
Vermillion SD 57069

SIOUX FALLS SD 570
14 JAN 2019 PM 2 L



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JAN 18 2019

Western Area Power Administration
Social Security Administration
JAN 17 2019
868 Billings MT
Att: ms Christina Gomer
2900 4th Ave. North
Billings MT 59101

59101-126699



SIERRA CLUB OF SOUTH DAKOTA

605-670-9738
mark.winegar@mac.com

220 Walker Street
Vermillion, South Dakota
57069

January 12, 2019

Ms. Christina Gomer
Western Area Power Administration
2900 4th Avenue North
Billings, MT 59101

Dear Ms. Gomer,


I am writing you today concerning the Lookout Solar Project as the chief executive of the Sierra Club's state chapter, a lobbyist, and a resident.

This project is very exciting as we need to transition away from fossil fuels quickly but the devil is in the details.

You must be transparent with the tribal nations. It is their land and they've lost too much to European expansion. They must have an active role in making critical decisions and the project must provide economic development for the tribes. Henry Red Cloud of Pine Ridge has been training and installing solar power for years. It would be wise to consult with him.

I'm looking forward to seeing the completion of this project. Please don't hesitate if there is anything I can do to help.

Sincerely yours,



Dr. Mark Winegar, Chairman



Western Area Power Administration

Lookout Solar Project

Public Scoping Meeting & Open House

Wednesday, December 5th,
2018

5:00 pm to 7:00 pm

Hot Springs Public Library

Thank you for your interest in the Lookout Solar Project. After reviewing all of the exhibits and speaking with project representatives, please complete the appropriate sections of this form to be included on the project mailing list and/or to provide comments. Comments can be submitted:

- At the scoping meeting
- By phone to (406) 255-2811
- By fax to (406) 255-2900
- E-mailed to gomer@wapa.gov
- Mailed to Ms. Christina Gomer, NEPA Coordinator

Your comments are important to us and will be accepted through Monday, January 7th, 2019 for formal consideration in the NEPA process.

Please Print Contact Information Below:

<u>Name:</u> <i>K. R. Couch</i>	<u>Organization:</u>
<u>E-mail Address (optional):</u> <i>couch@gwpc.net</i>	<u>Daytime Phone No. (optional):</u> <i>605-833-2370</i>
<u>Street Address:</u> <i>13603 - 7-11 Rd.</i>	<u>City / State / Zip Code:</u> <i>Butte Co, SD 57722</i>

- Please e-mail me the web link to the NEPA document when it becomes available (quickest and preferred method).
- I do not need a copy of the NEPA document.

Please Share Comments, Questions, or Concerns Below (continue on separate sheet if necessary):

1. Appears Lookout Solar is a foreign owned company. The foreign ownership could leave local entities holding the liabilities, if this project encounters difficulties.

2. Custer Co. Commission has already issued a Occupancy on Right-of-Way to Lookout Alternative Energy, LLC 3-8-2017 for the same route proposed by Lookout Solar.

Past wind farm project in this same area was handled very

poorly by Custer Co. Commission, causing grave concerns about how they may handle this project



2019 - Summer - Fall

SD not great potential for Solar Power

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Ms. Christina Gomer
Western Area Power Administration
2900 4th Avenue North
Billings, MT 59101



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Tyler Trevillyan
8008 Alberta Drive
Rapid City, SD

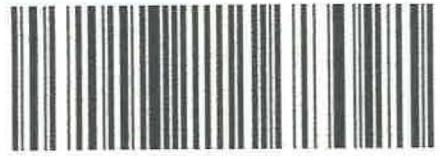
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Ms. Christina Gomer
Western Area Power Administration
2900 4th Avenue North
Billings, MT 59101



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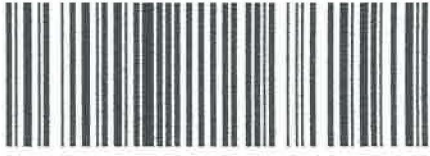
Dusty Johnson
U.S. House of Representatives
2457 Rayburn House Office Building
Washington DC 20515

Dusty Johnson

Ms. Christina Gomer
Western Area Power Administration
2900 4th Avenue North
Billings, MT 59101

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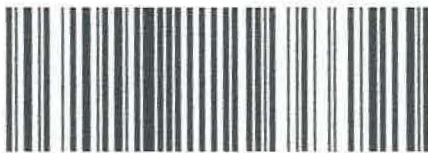


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Ms. Christina Gomer
Western Area Power Administration
2900 4th Avenue North
Billings, MT 59101



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Second Notice 12/27/18
Returned 1/6/19

David Ode
Missouri Breaks Audubon Society
PO Box 832
Pierre SD 57501

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WMC



Mike McNeill
U.S. Department of Agriculture
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Ms. Christina Gomer
Western Area Power Administration
2900 4th Avenue North
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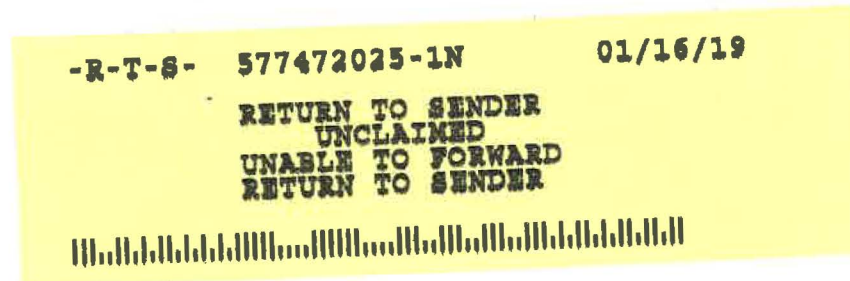


UNC

12-22
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01-07



Lance Russel
South Dakota Senate, District 30
PO Box 184
Hot Springs SD 57747



Area Power Admin
Avenue North
MT 59101



7018 2290 0002 3271 2507



12/29 ✓
1/3 ✓
1/13

Lynx Bettelyoun
Oglala Lakota County Highway Department
PO Box 208
105 Dakota Street
Batesland SD 57716

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Ms. Christina Gomer
Western Area Power Administration
2900 4th Avenue North
Billings, MT 59101

CERTIFIED MAIL



701& 2290 0002 3271 2507



12/29 ✓
1/3 ✓
1/13

Lynx Bettelyoun
Oglala Lakota County Highway Department
PO Box 208
105 Dakota Street
Batesland SD 57716

NIXIE 553 FE 1 0001/29/19

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD