

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

**IN THE MATTER OF THE APPLICATION BY SWEETLAND WIND FARM, LLC
FOR FACILITY PERMITS OF A WIND ENERGY FACILITY AND A 230-KV
TRANSMISSION FACILITY IN HAND COUNTY, SOUTH DAKOTA FOR THE
SWEETLAND WIND FARM PROJECT**

SD PUC DOCKET EL 19-012

**PRE-FILED SUPPLEMENTAL DIRECT TESTIMONY OF TODD MABEE
ON BEHALF OF SWEETLAND WIND FARM, LLC**

May 20, 2019

1 **I. INTRODUCTION AND QUALIFICATIONS**

2

3 **Q. Please state your name, employer, and business address.**

4 A. My name is Todd Mabee. I am employed at Western EcoSystem Technology,
5 Inc. ("WEST"), 2725 NW Walnut Blvd., Corvallis, OR 97330.

6

7 **Q. Did you previously submit Direct Testimony in this docket on March 9,
8 2019?**

9 A. Yes.

10

11 **II. PURPOSE OF TESTIMONY**

12

13 **Q. What is the purpose of your Supplemental Direct Testimony?**

14 A. The purpose of my Supplemental Direct Testimony is to provide an update
15 regarding the environmental surveys and studies conducted by WEST for the
16 Sweetland Wind Farm (the "Project").

17

18 **III. SURVEY UPDATE**

19

20 **Q. Do you have any updates to your Direct Testimony regarding
21 environmental surveys or studies that have been conducted for the
22 Project?**

23 A. Yes. Prairie grouse surveys were begun at the Project in April 2019, and Year 2
24 of the Baseline Avian Studies concluded in April 2019.

25

26 **Q. Please provide additional detail regarding the prairie grouse surveys.**

27 A. The prairie grouse surveys involve two rounds of aerial surveys, following by
28 three rounds of ground-based lek counts. The results of the surveys are
29 anticipated to be available June 2019, with a draft report available by July 2019.

30

31 **Q. Please provide additional detail regarding Year 2 of the Baseline Avian**
32 **Studies.**

33 A. Surveys were concluded April 2019, and draft results will be available in July
34 2019.

35

36 **IV. AVIAN MITIGATION AND AVOIDANCE MEASURES**

37

38 **Q. Are you aware of comments made at the April 25, 2019 public input hearing**
39 **regarding concerns about wildlife?**

40 A. Although I did not attend the public input hearing, I am aware that members of
41 the public commented regarding the Project's potential to impact wildlife, and
42 avian species in particular.

43

44 **Q. Has the Project incorporated measures to avoid and minimize impacts to**
45 **avian species?**

46 A. Yes, as described in the Application and in my Direct Testimony in more detail,
47 the Project incorporates numerous measures to avoid and minimize impacts to
48 avian species. One of these measures includes the preparation of a Bird and Bat
49 Conservation Strategy, with which WEST is assisting. The BBCS will be
50 available before Project construction begins.

51

52 **Q. What measures will the Project employ with respect to whooping cranes?**

53 A. The Project has been designed to avoid whooping crane impacts and will also
54 implement certain operational measures to further avoid impacts. With respect to
55 Project development and design, as described in the Application, a site-specific
56 whooping crane stopover habitat assessment (Appendix G to the Application)
57 was completed, consistent with recommendations from the USFWS. Suitable
58 habitat for whooping cranes is scattered throughout the Study Area and is
59 generally of lower quality than in surrounding areas, and no whooping cranes
60 have been observed during Tier 3 surveys for the Project. In addition, it is
61 important to note that no whooping crane has ever been killed by a wind turbine.

62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87

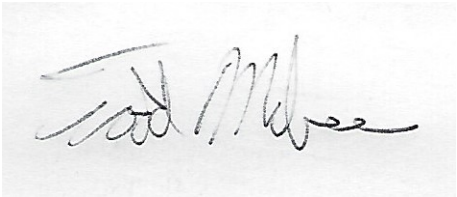
With respect to Project construction and operations, Project staff will be trained to recognize sensitive species (such as the whooping crane), and the Project will conduct construction monitoring during whooping crane migration seasons and stop construction activities within one mile of observed whooping cranes until the crane leaves. In addition, avian flight diverters will be installed along the length of the Gen-Tie Line to minimize potential collision impacts to whooping cranes and other species. The Project will also conduct operational monitoring during whooping crane migration seasons. Operations staff will be trained to identify whooping cranes, and if any are noted in the Project Area, turbines will be shut down within two miles of the crane until it leaves.

V. CONCLUSION

Q. Does this conclude your direct testimony?

A. Yes.

Dated this 20th day of May, 2019.



Todd Mabee

66773174