



IN REPLY REFER TO:
SWEETLAND
WIND PROJECT

United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Dakota Ecological Services
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July 5, 2019

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JUL 11 2019
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Mark Wengierski
Scout Clean Energy
Senior Project Manager
4865 Sterling Drive, Suite 200
Boulder, Colorado 80301

Darren Kearney
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, South Dakota 57501

Dear Mr. Wengierski/Mr. Kearney:

This letter is in regard to the Sweetland Wind Farm and associated facilities proposed in Hand County, South Dakota, near the town of Miller; we request that the South Dakota Public Utilities Commission (SDPUC) include this letter as part of the record for this project. Herein we convey some environmental concerns regarding the Sweetland project as currently proposed in materials submitted to the SDPUC.

Our primary recommendation to all wind energy developers in South Dakota is to focus on previously disturbed areas (e.g. croplands) for proposed facilities in order to limit the direct and indirect impacts those facilities have on wildlife in two of our most important habitats in the state: grasslands and wetlands. Per our August 28, 2018, letter to Western Area Power Administration (WAPA) regarding the Sweetland project, as well as discussions with Scout Clean Energy and WAPA during a subsequent site visit, we have stressed that avoidance of these areas is the primary means to reduce environmental impacts and we recommend doing so to the maximum extent possible. In the event these habitats cannot be entirely avoided, we have provided publications documenting avian avoidance of turbines that may be used to quantify these unavoidable impacts and assist in the development of offset plans to compensate for them. Based on our review of the current project proposal, it appears that about half of the proposed turbines are proposed on grasslands and we are unaware of any quantification of the anticipated impacts, nor a plan to offset the reduced value of these areas to native wildlife. Grassland habitats have been evaluated at the site, and similar to many areas in South Dakota, various tracts of land exhibit various levels of quality in terms of their remaining native plant species components. However, grasslands need not be pristine to support wildlife, and as shown in the

Leddy et al. 1999 publication, species utilizing replanted grasslands (Conservation Reserve Program) are known to be displaced by turbines. We recommend development and implementation of a plan to address this issue. We are willing to assist the Sweetland project to offset the displacement of avian species at this site.

Bat surveys were conducted at the Sweetland project area. However, we have reviewed existing survey reports for the project, and it appears the protocols applied do not adhere to our recommended Indiana Bat Summer Survey Guidelines, which are applicable to the northern long-eared bat. Acoustic detectors were placed on met towers and in grassland areas, not habitats conducive to the presence of the tree-roosting northern long-eared bat (as well as other migratory bats that may occur onsite which also use trees). There is no information on the amount or locations of potential suitable habitat for the northern long-eared bat in the survey reports. High frequency calls were detected at the site in grassland areas, but none were identified to species in order to determine whether northern long-eared bat calls were among them. While there is a 4(d) rule that currently does not prohibit take of the northern long-eared bat at wind energy facilities, if the goal of surveys is to “estimate levels of bat activity throughout the Project during the summer and fall” as stated in the reports, the methods used appear to be inadequate to meet that goal.

The Sweetland project falls within the boundaries of the whooping crane migration corridor. While the developer applied a method of evaluating suitability of individual wetlands in the project area, we recommend application of our HAPET Office’s model (Neimuth et al. 2018) to identify suitable habitat, which uses both landscape features and known whooping crane stopover locations to determine suitability. We have reviewed and provided comments to environmental consultant WEST on the proposed plan to address potential whooping crane presence at the Sweetland project. Similar plans have been provided by other developers that generally require shutdowns of turbines within 2 miles of any whooping cranes observed. These plans may or may not be effective, depending on the particular scenario, but certainly are less useful if monitoring is inadequate. We stress that an adequate number of observers should be tasked with actively searching for migrating whooping cranes, and efficient shutdown protocols are in place if shutdowns are to be achieved in timely manner and be protective of incoming cranes.

We recently provide comments to WAPA on a draft EA for this project. In that draft, it appears that previously unknown prairie grouse leks were discovered during surveys, in addition to existing leks, a criteria involving the limited number of observation years was applied. It was determined these sites were not leks because they had not been observed long enough. We submit that grouse displaying lekking behavior at a given site is adequate information to apply avoidance buffers to such an area. South Dakota Game, Fish and Parks recommends a 1-mile buffer; we submit that additional distance may be needed to ensure prairie grouse are not displaced from these important breeding sites.

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.

The Service appreciates the opportunity to provide comments. If you have any questions on these comments, please contact Natalie Gates of this office at (605) 224-8693, Extension 227.

Sincerely,



Scott Larson
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Literature Cited

Leddy, K. L., K. F. Higgins, D. E. Naugle. 1999. Effects of wind turbines on upland nesting birds in Conservation Reserve Program grasslands. *Wilson Bulletin* 111(1):100-104.

Niemuth, N. D., A. J. Ryba, A. T. Pearse, S. M. Kvas, D. A. Brandt, B. Wangler. 2018. Opportunistically collected data reveal habitat selection by migrating whooping cranes in the U.S. Northern Plains. *Condor* 120:343-356.