



SOUTH DAKOTA DEPARTMENT OF GAME, FISH AND PARKS

523 EAST CAPITOL AVENUE | PIERRE, SD 57501

February 27, 2020

Darren Kearny
South Dakota Public Utilities Commission
500 E Capitol Ave
Pierre, SD 57501

RE: Substitution of Raptor Study for Second Year of Post Construction Mortality Monitoring at
Crowned Ridge II

Dear Darren,

The South Dakota Department of Game, Fish and Parks (GFP) has been in discussions with Crowned Ridge Wind II (CR II) an indirect, wholly owned subsidiary of NextEra Energy Resources, LLC, Xcel Energy and Western Ecosystems Technology (WEST) Inc. to collaboratively fund and complete a 3-year, post-construction raptor study at Crowned Ridge I and II. This project is separate from, but related to, the current grouse telemetry study. These complementary projects have been designed to address impacts of wind energy development on the ecosystem, rather than focusing solely on an individual species. Game, Fish and Parks believes pursuing this additional project would be a wise use of project funds.

GFP supports the revision of stipulated condition no. 29 for CR II to only require the owner/operator of CR II (Xcel Energy) to conduct 1 year of post construction mortality monitoring to assess predictions of wildlife fatality risk at CR II, which is consistent with the voluntary US Fish and Wildlife Service Land-based Wind Energy Guidelines. Xcel Energy has agreed that the funds set aside for the 2nd year of post-construction mortality monitoring would then be reallocated to fund a three-year raptor study at CR I and CR II.

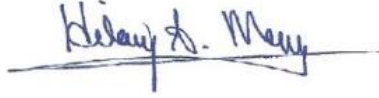
For additional background, GFP is working with CR II and Xcel Energy to pursue funding for this project with a State Wildlife Grant. State Wildlife Grants are used to support projects that benefit species of greatest conservation need and that help implement South Dakota's Wildlife Action Plan (<https://gfp.sd.gov/wildlife-action-plan/>). Through this program, 35% of the project budget must come from non-federal matching funds. Xcel Energy is proposing to re-allocate funding budgeted for the 2nd year of post-construction monitoring at CR II, to be used as the 35% match to fund a 3-year raptor study. The remaining 65% of the project budget would come from a State Wildlife Grant. This research project presents an opportunity for a collaborative partnership between the wind energy industry (Xcel/CR II), GFP and WEST Inc. to address knowledge gaps related to wind and wildlife interactions in South Dakota. We hope that this research will help GFP and wind energy developers to work together to develop future conservation actions in the form of siting recommendations and decisions that may affect raptor populations in South Dakota.

GFP biologists have partnered with biologists from WEST Inc. to develop survey methodology. Annual and final reports will be completed by WEST Inc. and provided to GFP, NextEra and Xcel. GFP staff will also work with WEST Inc. biologists to publish the results of this study in a peer-reviewed journal.

In closing, we support a permit condition to require 1 year of post-construction mortality monitoring at CR II, and to reallocate funding from the 2nd year of post-construction mortality monitoring to be used towards a raptor study.

Please contact me if you have any further questions.

Sincerely,

A handwritten signature in blue ink that reads "Hilary A. Morey". The signature is written in a cursive style and is positioned above a horizontal line.

Hilary Morey
Environmental Review Senior Biologist
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Pierre, SD 57501
hilary.morey@state.sd.us

cc: Kimberly Wells (NextEra Energy)
Natalie Gates (USFWS)
Patrick Flowers (Xcel Energy)