

APPENDIX C

Environmental Commitments

from the

Philip Wind Energy Center Interconnection Request

Environmental Assessment

Table 1-1. Applicant-Committed Natural Resources Setbacks for Turbine Locations

Category		Setback Description	Setback Origination
Wetlands with TWI scores of 4–11	1,000 ft	No turbines ≤ 1,000 ft from wetlands with TWI scores of 4–11.	Applicant-committed setback based on natural resources surveys
Wetlands with TWI scores of 12–14	0.5 mile	No turbines ≤ 0.5 mile from wetlands with TWI scores of 12–14.	Applicant-committed setback based on natural resources surveys
Native (unbroken) sod grasslands	–	No turbines on native (unbroken) sod grasslands.	Applicant-committed setback based on natural resources surveys
Prairie grouse leks	1 mile	No turbines on unbroken grasslands ≤ 1 mile from active prairie grouse leks.	Applicant-committed setback based on natural resources surveys
Prairie grouse habitat models	–	No turbines on the SDGFP Tier 1 or 2 modeled priority habitat areas.	Applicant-committed setback based on natural resources surveys
Prairie dog colonies	500 meters	No turbines ≤ 500 meters from active prairie dog colonies.	Applicant-committed setback based on natural resources surveys
Eagle nests	2 miles	No turbines ≤ 2 miles from eagle nests.	Applicant-committed setback based on natural resources surveys
Red-tailed hawk nests	800 meters	No turbines ≤ 800 meters from red-tailed hawk nests.	Applicant-committed setback based on natural resources surveys
Northern long-eared bat (NLEB)	0.5 mile	No turbines ≤ 0.5 mile from known or presumed occupied foraging, roosting, and commuting NLEB habitat.	Applicant-committed setback in adherence with PBA Consistency Evaluation Forms

NLEB	10 miles	No turbines $\leq$ 10 miles from NLEB hibernacula (nearest known is $\approx$ 68 miles away).	Applicant-committed setback in adherence with PBA Consistency Evaluation Forms
Piping plover	1.5 miles	No turbines in the Missouri (including Niobrara River), Platte (including Loup and Elkhorn Rivers), and Yellowstone River system floodplains or $<$ 1.5 miles from suitable sandbar habitat and reservoir shorelines with nesting, resting, and foraging areas. The nearest piping plover record is a 2014 sighting $\approx$ 20 miles south of the proposed Project area. Designated critical habitat is $\approx$ 30 miles northeast.	Applicant-committed setback in adherence with PBA Consistency Evaluation Forms
	1.5 miles	No turbines $<$ 1.5 miles from known sandpit nesting, resting, and foraging areas along the Platte River (including Loup and Elkhorn Rivers) system.	Applicant-committed setback in adherence with PBA Consistency Evaluation Forms
	3 miles	No turbines $<$ 3 miles from alkali lakes with documented piping plover nesting or those designated as critical habitat.	Applicant-committed setback in adherence with PBA Consistency Evaluation Forms
	3 miles	No turbines between alkali lakes identified with a 3-mile buffer where the outer limit of the buffer zones is $<$ 3 miles apart.	Applicant-committed setback in adherence with PBA Consistency Evaluation Forms
	1.5 miles	No turbines $<$ 1.5 miles from designated riverine critical habitat or $<$ 3 miles from designated alkali wetland critical habitat.	Applicant-committed setback in adherence with PBA Consistency Evaluation Forms
Whooping crane	5 miles	No turbines $\leq$ 5 miles from designated critical habitat (the nearest is $>$ 200 miles away near Lexington, Nebraska).	Applicant-committed setback in adherence with

PBA Consistency
Evaluation Forms

Note: TWI = The Wetlands Institute.

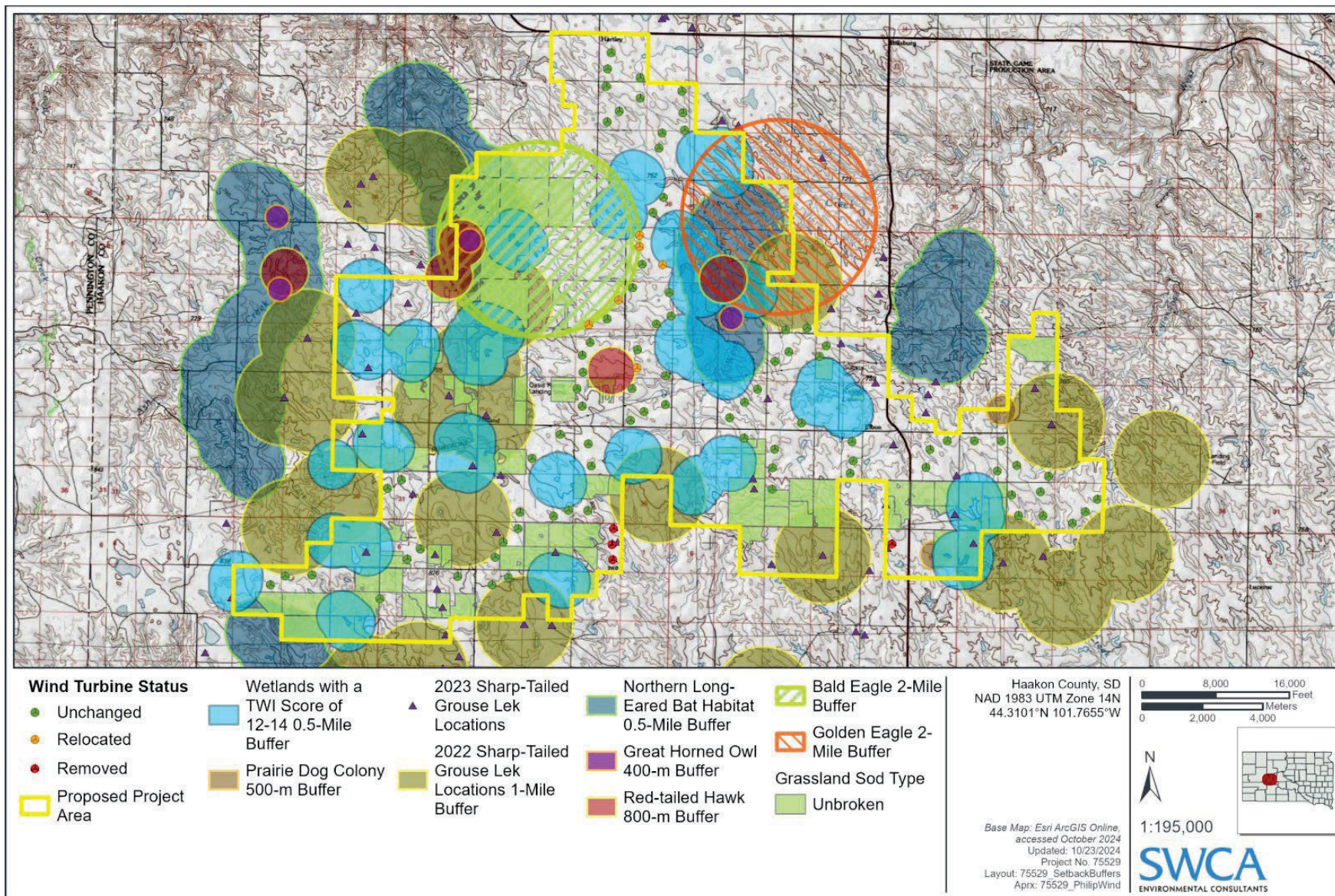


Figure 1-3. Natural resources setbacks and turbine locations.

Table 2-3. Applicant's Additional Voluntary Environmental Protection Measures

Resource	Applicant's Additional Voluntary Environmental Protection Measures
Land use & public facilities	Coordinate turbine siting and operation activities with landowners to reduce interference with farming or livestock operations. This may include agreed-upon turbine sites, maintenance of gates and cattle guards where access roads cross existing fence lines, access control, signing of open range areas, traffic management (e.g., vehicle speed management), and safe operations of agricultural aviation activities.
Geology, soil resources, & paleontology	- Perform soil borings at wind turbine sites to assist with specific designs and construction parameters. - Test soil samples to determine engineering characteristics of the site subgrade soils. - Obtain coverage under the General Permit for Stormwater Discharges Associated with Construction Activities issued by the South Dakota Department of Agriculture and Natural Resources (SDDANR). This permit requires development and implementation of a stormwater pollution prevention plan. The Project's Stormwater Pollution Prevention Plan would be developed during civil engineering design of the Project and include BMPs to control erosion and sedimentation. - Regularly inspect access roads, utility and t-line corridors, and structure site areas for damage from erosion, washouts, and rutting. Initiate corrective measures immediately upon evidence of damage. - Correct drainage problems caused by construction to avoid damage to agricultural fields. - De-compact subsoil in temporarily disturbed areas following completion of construction and during decommissioning. - Salvage and segregate topsoil from excavation and construction activities to reapply to disturbed areas once construction is completed.

	• Remove turbines and ancillary structures from the proposed Project area during decommissioning. Do not bury or leave in place excess concrete in active agricultural areas, excluding belowground portions of decommissioned turbine foundations intentionally left in place. • Where practicable, place ground-disturbing activities and structures in areas previously disturbed through prior human activities. • Based on the presence of Potential Fossil Yield Classification (PFYC) 4 and U (unknown) geological units, a qualified paleontologist would review the final Project design and conduct field reconnaissance of exposures of geological units designated as PFYC 4 and a portion (at least 50% of exposures, e.g., drainage cuts and human-made exposures) of units designated as PFYC U. • If paleontological resources are found in the proposed Project area, their disposition would be in accordance with agreements between the surface estate owner and the Project proponent.
Wildlife	• Design and construct the Project's aerial power lines to minimize avian electrocution and collision risks as outlined in APLIC's <i>Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006</i> and <i>Reducing Avian Collisions with Power Lines: The State of the Art in 2012</i> (APLIC 2006, 2012). • Implement a Bird and Bat Conservation Strategy (BBCS) (see Appendix P) in accordance with the USFWS's <i>Land-Based Wind Energy Guidelines</i> (USFWS 2012) to minimize impacts to avian and bat species during construction and operation of the Project. • Turbine blades will be feathered below the cut-in wind speed November 1 to August 15. Curtailment will occur from 30 minutes before sunset to 30 minutes after sunrise when the temperature is above 40 degrees Fahrenheit and following the cut-in wind speeds and related timeframes specified below (adapted from USFWS [2024a, 2024b, 2024c, 2024d]; Jordan 2020): August 16 to October 31 at 5 meters per second.

	• Train O&M staff to recognize sensitive species as described in the BBCS (see Appendix P). Report observations of listed species fatalities to the appropriate state or federal agency within 48 hours of species identification. • Instruct employees, contractors, and visitors to avoid harassment/disturbance of wildlife, especially during reproductive (e.g., courtship and nesting) seasons. • Use designs for permanent MET towers that do not require guy wires. • Dispose of garbage or human waste generated on-site promptly to avoid attracting nuisance wildlife.
Hazardous materials & solid waste	• If contamination is caused by or encountered during on-site construction activity, report the contamination to the SDDANR at (605) 773-3296. Contaminated soil that has been excavated would be segregated from clean soil and sampled to determine disposal requirements. Piping, equipment, or other material to be placed in locations where it would be in contact with contaminated soil or groundwater would be evaluated to determine compatibility with the contaminant.