

**Bureau of Land Management (BLM) Idaho Resource Advisory Council (RAC)
Lava Ridge Wind Project Subcommittee (Subcommittee)
Final Report**

- *Does the information in the draft EIS provide sufficient detail for concerns raised by stakeholders? If not, what additional detail is needed?*
- *Does the draft EIS consider the significance of the potential impacts and how they affect the concerns raised by stakeholders?*
- *Is there any additional information that is relevant to the project and stakeholder concerns that the BLM didn't include in the draft EIS?*

Tribal perspective/cultural resources and Minidoka National Historic Site/Japanese American community

- 1) Recommend the cultural resource sites need to be identified prior to ground disturbance, beginning with known highly sensitive areas.
- 2) Recommend that BLM add analysis to the DEIS on how irreversible, irretrievable losses of cultural sites, Tribal treaty rights, and Traditional Cultural Properties will be mitigated.
- 3) Recommend that BLM modify the DEIS to identify more compensatory mitigation for cultural resources, treaty rights and environmental justice issues. Recommend BLM modify the DEIS to include acquiring land as mitigation at a higher rate than the loss to account for the impacts, in addition to other possible treaty rights mitigations, and outline the timeframe and a mechanism to acquire the land.
- 4) Recommend BLM follows policy regarding the identification and protection of cultural resource sites. Have archaeologists on site during construction to ensure sites are avoided. The Historic Properties Management Plan must include these details; sub-committee needs to see the HPMP because they can't evaluate the impacts without it. The Historic Context document would be helpful too; would like to see it as well.
- 5) Recommend BLM do an ethnographic study to guide the impact analysis and remove it from all the compensatory mitigation sections throughout the document.
- 6) Recommend the Environmental Justice section should include more detail relating to Tribal treaty rights, historic resources, and emotional impacts to Japanese Americans and Alaskan natives. Social and economic data from counties where tribes reside should be included as well.
- 7) Recommend replacing the current purpose and need with a purpose and need to preserve and protect the Minidoka National Historic and Relocation Center site, and additional federal land, to tell the whole story of their experience, as required by Congress. Support No Action Alternative A because of the significant negative impact on the Japanese American community and Minidoka National Historic Site.

- 8) Recommend that BLM include protective measures for the Minidoka NHS, MRC, and Minidoka TCP. Recommend BLM consider the impact on Alaskan natives that were incarcerated at MNHS and the social/health/trauma impact on the Japanese American community in greater detail. It is a sacred site.
- 9) If the project goes forward against the strong objection of the subcommittee, recommend that BLM include a methodology to mitigate the psychological impacts on Japanese Americans for the loss of their sacred ground and their sense of purpose. Minidoka gives their community a sense of purpose and meaning. It ties the past to current events and gives them a purpose.
- 10) If the project goes forward against the strong objection of the subcommittee, the BLM should include a specific process to acquire conservation easements to preserve adjacent private lands in the compensatory mitigation section to ensure that mitigation is durable/effective.
- 11) If No Action Alternative A is not selected, recommend the DEIS not be finalized until MVE has an agreement in place with the Japanese Americans and Alaskan Natives.

Wildlife/Avian

- 1) Recommend BLM include more detailed analysis of population level impacts and population connectivity, not just habitat connectivity.
- 2) Recommend BLM use most current Fish and Game data on big game density, populations, migration routes and noise impacts (regarding the model used, 15 yr old data)
- 3) Recommend that BLM's action alternatives avoid or minimizes impacts to both sage grouse habitat and the Owinza pronghorn migration route. There is no existing alternative that avoids the pronghorn migration route. Action alternatives should not include siting corridors in migration routes.
- 4) Recommend the DEIS includes a clearer description of duration/type of temporary fencing at different phases of the project and an analysis of temporary fence impacts to wildlife. Ensure commitment that new fencing associated with the project is truly temporary if an action alternative is selected.
- 5) Recommend the DEIS includes additional population viability/sustainability assessment on raptors and bats.
- 6) Recommend the DEIS include a full analysis of the Townsend's big eared bat, not a cursory review.
- 7) Recommend a preemptive seasonal curtailment strategy to reduce bat mortality, rather than waiting for high mortality to start curtailment.
- 8) Recommend consider cumulative impacts from additional proposed wind, solar, and battery projects in the region.
- 9) Recommend BLM work with IDFG to analyze a potential of private land depredation and the resulting issues, as big game are displaced from public lands onto private lands, including the additional depredation cost to IDFG and sportsmen.

- 10) Recommend BLM add more detail to the DEIS regarding mitigation measures for wildlife with consideration of long-term displacement impacts and irreversible/irretrievable losses that cannot be mitigated.
- 11) Recommend BLM consult with IDFG and NPS bat experts locally to craft specifically tailored fatality thresholds that would lead to operational curtailment and compensatory mitigation for bats in this region, as well as other species.
- 12) Recommend BLM incorporates Tribal and cultural/spiritual perspectives into wildlife/cultural impact analysis.
- 13) Recommend BLM consider how a potential listing of little brown bat might affect the DEIS.
- 14) Recommend No Action Alternative A due to impacts to all wildlife species displacement and fatalities, including eagles. The subcommittee finds the estimated number of fatalities unacceptable.

Outdoor Recreation

- 1) Recommend BLM include additional analysis of long term direct and indirect, spatial impacts to recreation, based on the impacts to wildlife/avian/pollinators, and recreation distribution/displacement.
- 2) Recommend BLM include recreation user map of OHV routes in the area.
- 3) Recommend BLM incorporate relevant IDFG data for additional analysis of upland bird hunting experience.
- 4) Recommend the DEIS clearly recognizes the State constitutional right to hunt, fish and trap on public lands, but that access may be temporarily restricted for safety purposes in places during construction.
- 5) Recommend examining the visual impact on the alpine ski experience from the Seattle Ridge at the Sun Valley resort.
- 6) Recommend No Action Alternative A because of the significant negative impacts on recreational opportunities and experience for multiple recreational users.

Grazing

- 1) Recommend No Action Alternative A because of unacceptable impacts to permittees, rangeland health and livestock, due to the static nature of livestock grazing proximity to base property and rangeland improvements, as well as loss of forage during construction, operation/maintenance/decommissioning, increased roads, and financial loss to permittees.
- 2) If No Action Alternative A is not selected, recommend the DEIS not be finalized until MVE has an agreement in place with the grazing permittees to their satisfaction, including a compensation plan for loss of livestock from construction, operation, maintenance, and decommissioning, including but not limited to fencing, fire, and weed control.

Other

- 1) Recommend selection of No Action Alternative A.
- 2) Recommend selection of No Action Alternative A due to all impacts to public services, including Jerome County and surrounding airports, other aviation, and emergency communications for EMS/Law Enforcement/Fire, and as well as current and potential future business needs. Recommend updating the DEIS to include newest FAA ceiling requirement that affects Jerome airport and pilots, acknowledging risk to flights in and out of the airport.
- 3) Recommend that the purpose and need statement address where the generated power is going and if the transmission line has the capacity to accept the power.
- 4) Recommend that the conformance section be rewritten to find that the proposal does not conform with the Monument RMP because of the plan's requirement to protect sensitive values, including Minidoka Traditional Cultural Property (TCP).
- 5) Recommend No Action Alternative A based on the analysis of the negative cumulative impacts of the 2.5 million trips related to construction/maintenance traffic, in addition to the increased recreational-related traffic and public presence on resources such as grazing, wildlife, tourism, Hwy 93/75 commuters, and cultural resources, as well as the potential for increased risk of fire from the additional miles of new roads.
- 6) Recommend additional information and analysis of the impacts of additional traffic in the area on Tribes and recognition of treaty rights is needed in the DEIS, including on Tribal gathering, fishing, hunting and trapping access.
- 7) Recommend that BLM adopt protective measures for the cultural landscape and heritage of wise multiple use.
- 8) Recommend BLM begin a public process to amend the Monument RMP to designate protective measures around Minidoka and other wise multiple uses, subject to valid existing rights.
- 9) If No Action Alternative A is not selected, recommend the DEIS not be finalized until MVE has an agreement in place with local Highway and Irrigation Districts that maintain highways, bridges and other public conveyances in the project area.
- 10) Recommend No Action Alternative A based on the potential for unknown effects to the aquifer and wells.
- 11) Recommend No Action Alternative A due to impacts to private property values. If No Action Alternative A is not selected, recommend the DEIS not be finalized until MVE has agreements in place with private landowners to compensate for potential property value loss.