

Appendix F

Chokecherry and Sierra Madre Wind Energy Project Environmental Assessment for Infrastructure Components Public Comments Summary

The BLM received eight comment documents from the public and agencies during the EA for Infrastructure Components review period (August 11, 2014 to September 10, 2014). Within those eight comments documents, the BLM identified 33 individual comments including non-substantive statements, concerns or recommendations. Appendix XX includes a table identifying the individual comments and the BLM responses to those comments. The non-substantive comments, which did not require any changes to the EA, generally demonstrated support for the project, summarized elements of the proposed project or identified that the analysis was adequate for assessing potential impacts. Several substantive comments requested changes or additions to the Decision Record and that additional information from the SPODs be included in the EA. The BLM updated the Decision Record as needed, and the EA incorporates or references the SPODs, which are included as an appendix to the EA.

The BLM received several comments with concerns related to dust generation, impacts to National Scenic Trails and National Historic Trails, and impacts to socioeconomic factors. Impacts to these resources are detailed in the EA text and tiered to the analysis in the CCSM FEIS (BLM 2012b). Some comments expressed concerns surrounding impacts to wildlife, including the protection of migratory birds and raptors, Greater Sage-Grouse, and big game. The EA text and appendices address these concerns and related measures, reference the CCSM FEIS (BLM 2012b) that fully analyzes these topics, and incorporate all necessary RMP requirements. The comments also expressed concerns related to aquatic resources. The BLM updated the EA to include information and measures on aquatic resources and water depletions, as identified by the USFWS in the Biological Opinion for the CCSM Project.

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1	1	PCW, LLC	PCW agrees with BLM’s analysis and conclusion that the Proposed Action will have no new significant impacts that were not adequately disclosed in the CCSM Project’s Final Environmental Impact Statement.	Non-substantive	Thank you for your comment. Please note we have categorized your comment as non-substantive as it did not pertain to a specific issue. Non-substantive comments generally include value-type comments that do not include justification or facts to back up the statement, comments that do not pertain to the project, and other comments that may require action, but not a response (e.g., change my address, extend the comment period). Substantive comments are those that suggest the analysis is flawed in a specific way and require a BLM response.
2	1	PCW, LLC	<p>The draft Decision Record provides that: “Upon completion of the Phase I Turbine Development NEPA analysis and decision determination, the Infrastructure Components and the Phase I Turbine Development will be included in one wind energy development grant. Notice to Proceed (NTP) for individual SPODs would be issued as the NEPA and permitting requirements are completed.”</p> <p>Although achieving the same result as a practical matter, this process differs procedurally from what was anticipated in the BLM’s Record of Decision on the CCSM Project (BLM 2012). Therefore, PCW recommends that BLM include an explanation in the EA, the Decision Record or both, as BLM deems appropriate, such as the one set out below.</p> <p>The BLM has reviewed the process set out in the BLM’s Record of Decision on the CCSM Project (BLM 2012) for the issuance of ROW Grant(s). The BLM is employing a revised procedure that complies with BLM’s IM 2010-156 and achieves the same practical result. This revised procedure is to issue one right-of-way grant (ROW) –Type III Development Grant – for Phase I of the CCSM Project and then, issue separate Notices to Proceed (NTP) as to each of the four site-specific plans of development (SPOD). The BLM, however, will not issue any NTPs authorizing construction until PCW has developed an adequate Compensatory Mitigation Plan (CMP) for cultural resources. The BLM will not issue a NTP authorizing wind turbine construction until the USFWS concurs on the APPs and ECPs.</p>	NEPA	See updated language in the Decision Record. The Decision Record has been revised to explain the procedure for issuing the Notice to Proceed.

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			<p>This revises the procedure set out in the ROD which provides that the “BLM will not issue right-of-way (ROW) grants for the CCSM portions of the project to PCW until the BLM determines that PCW has developed an adequate Compensatory Mitigation Plan (CMP) for cultural resources and the U.S. Fish and Wildlife Service (USFWS) issues letters of concurrence on Eagle Conservation Plans (ECPs) and Avian Protection Plans (APPs).” See BLM ROD at ES-1, ES-2, 1-1, 3-1 (2012). The ROD states that “After USFWS issues letters of concurrence for the APPs and ECPs, BLM will incorporate those measures into subsequent NEPA analyses and ROW grants.” See BLM ROD at 1-2.</p> <p>Issuing one ROW Grant for Phase I of the CCSM Project instead of multiple ROW Grants is consistent with the ROD which provides for “up to five separate ROW grants to implement SPODs prior to approval of construction.” See BLM ROD at 3.8 (2012). Next, this revised procedure – the issuance of a ROW grant – but then issuance of NTPs contingent upon the conditions outlined above with respect to the CMP, ECP and APP achieves the same practical result as the procedure outlined in the ROD and is consistent with the approval procedure outlined in the BLM’s IM 2010-156.</p> <p>Under the revised procedure, BLM retains enforcement authority to prevent construction of turbines before USFWS concurrence is obtained as provided in the ROD and BLM is under no obligation by virtue of granting the ROW to issue a NTP unless and until the USFWS concurs with the ECP and APP. Therefore, BLM’s revision of the procedure outlined in the ROD amounts to a procedural change that does not result in any environmental impacts not analyzed in the EIS.</p> <p>PCW believes that including an explanation, such as the one above, in the EA, the Decision Record, or both, as BLM determines is appropriate, fully addresses the issue of the revised procedure.</p>		
3	1	PCW, LLC	According to the BLM’s NEPA Handbook, the Decision Record should include a summary of public involvement undertaken, comments received, and a description of how substantive	NEPA	See updated language in the Decision Record. . The Decision Record has been revised to include information on the public involvement process.

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			comments were considered in making the decision. See BLM NEPA Handbook H-1790-1 at 85. The Decision Record should be revised to meet this requirement.		
4	1	PCW, LLC	Under Rationale for Decision in the draft Decision Record, there is a reference to “i.e. lease stipulations.” This reference does not apply to the CCSM Project and should be removed from the text. Examples that would be appropriate are “i.e. ROW conditions” or “i.e. Applicant Committed Mitigation Measures.”	NEPA	See updated language in the Decision Record. The Decision Record has been revised to incorporate this change.
5	2	Russ and Shelby Caldon	With all of the amazing and competent planning and work that the Power Company of Wyoming is doing, we hope the EA will be done in a quick, concise and efficient manner. With the drought drying up the water which produces the Hydro Power for our friends to the Southwest, this should be a wonderful manner in which to subsidize that problem. Thank You for looking out for the citizens of this country---and you do a far better job than the politicians do. We are totally behind and for this project. No coal jobs should be lost if they will follow the leads of Public Service Co of Colorado and clean up the existing plants and do not run them @ 125% above what they were designed for.	Non-substantive	Thank you for your comment. Please note we have categorized your comment as non-substantive as it did not pertain to a specific issue. Non-substantive comments generally include value-type comments that do not include justification or facts to back up the statement, comments that do not pertain to the project, and other comments that may require action, but not a response (e.g., change my address, extend the comment period). Substantive comments are those that suggest the analysis is flawed in a specific way and require a BLM response.
6	3	Board of Carbon County Commissioners	<p>The construction of this infrastructure will result in a significant amount of soil disturbance and vehicle trips on unpaved roads. The County is concerned about the amount of dust that will be generated, as documented in Appendix D, Air Quality Emissions Calculations. Dust control methods include using water (resource roads) and chemical (local roads) as a dust suppressant, along with vehicle restriction speed limit of 25 mph. According to the information provided on Page 3-12, if the use of magnesium chloride is approved, water requirements may be reduced by as much as 30 percent. A 30 percent reduction in water use translates into significant cost savings-pumping & handling cost, as well as the avoidance of water depletions and related environmental impacts.</p> <p>Carbon County supports the applicant's request (Page 3-12) to utilize alternative dust control measures to improve the longevity of dust control and reduce water use for dust suppression. It is our understanding that PCW will not apply</p>	Water	Thank you for your comment. Appendix C in this EA includes the Applicant Committed Measures, Applicant Committed Best Management Practices, and Proposed Mitigation Measures. Applicant Committed Measures A-3-01 through A-3-05 address dust control, including the use of magnesium chloride, if needed.

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			chloride compounds or lignin derivatives within 500 feet of perennial streams on federal lands. Properly constructed roads that include application of chemical stabilizers should improve durability and minimize water demand and the need for dust control.		
7	4	Carbon County Economic Development Corporation	On behalf of Carbon Co. Economic Development Corporation, we feel that all the infrastructure components of the Chokecherry Sierra Madre Wind project has had sufficient study and feel that there are no problems.	Non-substantive	Thank you for your comment. Please note we have categorized your comment as non-substantive as it did not pertain to a specific issue. Non-substantive comments generally include value-type comments that do not include justification or facts to back up the statement, comments that do not pertain to the project, and other comments that may require action, but not a response (e.g., change my address, extend the comment period). Substantive comments are those that suggest the analysis is flawed in a specific way and require a BLM response.
8	4	Carbon County Economic Development Corporation	The rock quarry, rail facility & haul roads have been placed in areas that will have no impact on environmental issues, historic trails and visual impact.	Non-substantive	Thank you for your comment. Please note we have categorized your comment as non-substantive as it did not pertain to a specific issue. Non-substantive comments generally include value-type comments that do not include justification or facts to back up the statement, comments that do not pertain to the project, and other comments that may require action, but not a response (e.g., change my address, extend the comment period). Substantive comments are those that suggest the analysis is flawed in a specific way and require a BLM response.
9	5	Battle Pass Scenic Byway Alliance, Inc.	I support Alternative B, the Proposed Action, and ask that the BLM approve the right-of-way grants necessary for the infrastructure components to be constructed. The EA clearly demonstrates there are no new or significant impacts identified beyond those already disclosed in the EIS.	Non-substantive	Thank you for your comment. Please note we have categorized your comment as non-substantive as it did not pertain to a specific issue. Non-substantive comments generally include value-type comments that do not include justification or facts to back up the statement, comments that do not pertain to the project, and other comments that may require action, but not a response (e.g., change my address, extend the comment period). Substantive comments are

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					those that suggest the analysis is flawed in a specific way and require a BLM response.
10	5	Battle Pass Scenic Byway Alliance, Inc.	As shown on page 3-9 of Map 3-1, National Scenic Trails and National Historic Trails, the CCSM Project infrastructure components have been carefully sited to avoid and minimize impacts on the trails and cultural resources. I appreciate that none of the wind turbines will be located on the footprint of any of the trails, and that the Internal haul road and transmission line will cross the Overland Trail in one coordinated place in a non-contributing trail segment. The road, rock quarry and rail facility cannot be seen from most of the trail locations at all because they are miles away. Overall, this is a fine project that will benefit the people of Carbon County and it will not prevent any of our visitors from traveling on or enjoying the Continental Divide National Scenic Trail. This project also will not be visible from Carbon County's most scenic tourism areas: The Battle Pass Scenic Byway, the Snowy Range Scenic Byway, or the Seminoe-Alcova Scenic Backway.	Trails	Thank you for your comment. The BLM worked with PCW to minimize impacts to national scenic and historic trails from the Infrastructure Components and the CCSM Project as a whole.
11	5	Battle Pass Scenic Byway Alliance, Inc.	Whether the wind project is viable from the historic trails should not matter much as considering, is this project consistent with Carbon County's traditions and history? Experience and history say yes, it is. This pioneering wind project is entirely consistent with the spirit of innovation and progress that developed modern Carbon county in the first place, bringing jobs and economic opportunity that we all enjoy today.	Socioeconomics	Thank you for your comment. The CCSM Project FEIS identified the socioeconomic impacts from the project and the EA provided additional information on these types of impacts.
12	5	Battle Pass Scenic Byway Alliance, Inc.	The citizens of Carbon county support this project. I attended the BLM public open house meeting in Saratoga on August 25th and there was not one person there in opposition. When the Wyoming Industrial Siting Council held its permit hearings in Saratoga on August 5-6, there was no local opposition to the project permit and no opposition from ANY of the many Wyoming state agencies that participated in the permit review process, including the Wyoming Historic Preservation Office. I hope that BLM can complete the second Environmental Assessment and issue the rights-of-way grants as needed as	Non-substantive	Thank you for your comment. Please note we have categorized your comment as non-substantive as it did not pertain to a specific issue. Non-substantive comments generally include value-type comments that do not include justification or facts to back up the statement, comments that do not pertain to the project, and other comments that may require action, but not a response (e.g., change my address, extend the comment period). Substantive comments are those that suggest the analysis is flawed in a specific way and require a BLM response.

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			soon as possible.		
13	6	U.S. Fish and Wildlife Service	The SPODs contain substantially more information than the EA1, which largely incorporates information from the SPODs by reference. While it is impractical to repeat all of the material contained in the SPODs, we recommend EA1 include more information about the timing of both construction and operation of the infrastructure components (Phase I Haul Road and Facilities, West Sinclair Rail Facility, and Road Rock Quarry), particularly as it relates to stipulations and protections for eagle and raptor nests. This information might be easily conveyed in a table that includes all infrastructure components and the timing of activity for initial construction, operations during construction of the turbines, decommissioning, and long-term use (if any) during operation of the wind facility. Currently, this information is spread throughout multiple SPODs. Including a summary table (or using another means to capture this information) would allow the reader to easily understand when impacts might occur, and would assist us in our analysis of potential impacts to eagle and raptor nests.	Migratory Birds and Raptors	Thank you for your comment. Please note, the SPODs are included as Appendix E to the EA and therefore the detailed information is included as part of the EA. In addition, Appendix D of the CCSM Project ROD includes the Applicant Committed Measures, Applicant Committed Best Management Practices, and Proposed Mitigation Measures.
14	6	U.S. Fish and Wildlife Service	In some cases, the SPODs may contain specific information or additional commitments to protect eagle and raptor nests than what is in Appendix D of the Record of Decision (ROD) for the Final Environmental Impact Statement for CCSM. For example, construction of the rock quarry will occur after the nesting season, instead of the project proponent requesting an exception to construct during the nesting season. We recommend that EA1 identify any additional measures from the SPODs that avoid and minimize disturbance to eagles.	Migratory Birds and Raptors	Please note, the SPODs are included as Appendix E to the EA and therefore the detailed information on commitments to protect eagle and raptor nests is included as part of the EA. In addition, under section 4.2.14.2.4 in the EA, the second bullet under the Applicant Committed Measures includes A-1-09, which states, "Timing and spatial stipulations will be used on public lands."
15	6	U.S. Fish and Wildlife Service	Also, we recommend that EA1 include a discussion about "disturbance" of eagles (at nests) in the environmental consequences section. For example, initiating construction activities in close proximity to an eagle nest later in the spring (e.g., April) might cause eagles that started nesting earlier (e.g., February) to abandon their eggs or young, resulting in take. "Activities associated with pre-construction, construction, or operation and maintenance of a [wind] project might cause disturbance and result in loss of productivity at nearby nests [and]...could result in the permanent or long term loss of a nesting territory. All of these impacts, unless properly	Migratory Birds and Raptors	The CCSM Project FEIS analyzes impacts to raptors, including eagles, for the entire Project Area (p. 4.14-9 to 4.14-24) and this analysis is incorporated into the EA through the tiering process. Appendix D of the CCSM Project ROD includes the Applicant Committed Measures, Applicant Committed Best Management Practices, and Proposed Mitigation Measures, of which, Applicant Committed Measure A-1-09 states, "Timing and spatial stipulations will be used on public lands." The timing stipulation would mitigate the impacts to

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			permitted, are violations of [the Bald and Golden Eagle Protection Act]" (Eagle Conservation Plan Guidance2013, p. 9). "Disturb" means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior (50 CFR 22.3).		nesting eagles for construction activities. As required by the CCSM Project ROD, PCW, in consultation with USFWS, is developing an Eagle Conservation Plan (ECP) to avoid, minimize, and mitigate impacts to eagles for the CCSM Project. The USFWS is preparing an EIS to determine whether to issue PCW an eagle take permit.
16	6	U.S. Fish and Wildlife Service	Disturbance can be largely avoided by implementing the measures contained in Appendix D of the ROD; however, exceptions to the measures can be requested by the project proponent. A request does not mean the Bureau of Land Management (BLM) will grant the exception, but neither EA1 nor Appendix D describes the conditions or decision criteria BLM would consider in granting an exception. While each request is likely to have unique circumstances, we recommend EA1 include a commitment to avoid granting exceptions that are likely to result in disturbance take (50 CFR 22.3) and that requests that could result in disturbance take are coordinated with the appropriate U.S. Fish and Wildlife Ecological Services and Migratory Bird Management Offices.	Migratory Birds and Raptors	Please refer to the exception, waiver, and modification process described in Appendix 9 of the Rawlins RMP 2008. The BLM will comply with the standards set out in the Rawlins RMP when considering exceptions to wildlife stipulations.
17	6	U.S. Fish and Wildlife Service	While the BLM has authority under a right-of-way (ROW) agreement with the project proponent to authorize certain exceptions to the measures in Appendix D of the ROD (some of which could result in disturbance take of eagles), this is only a legal authorization for the action and is not a legal authorization to take eagles by disturbing them. Only the Service has the authority to authorize disturbance take by providing permits for disturbance take to eagles. If disturbance take is likely from infrastructure components (e.g., haul road, gravel pit, water extraction facilities) and the components cannot be relocated or altered to avoid disturbance take, we recommend the project proponent and BLM work with the Service as early as possible to evaluate alternatives, including application for disturbance take.	Migratory Birds and Raptors	Thank you for your comment. Please refer to the exception, waiver, and modification process described in Appendix 9 of the Rawlins RMP 2008. The CCSM Project will comply with the same standards for granting exceptions to wildlife stipulations. As required by the CCSM Project ROD, PCW, in consultation with USFWS, is developing an Eagle Conservation Plan (ECP) to avoid, minimize, and mitigate impacts to eagles for the CCSM Project. The USFWS is preparing an EIS to determine whether to issue PCW an eagle take permit. In addition, the BLM is a cooperating agency on the FWS eagle take permit EIS and appreciates the FWS commitment to act as a cooperating agency on this EA.

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18	6	U.S. Fish and Wildlife Service	In addition, we recommend EA1 evaluate the potential impacts to nesting eagles for all nests that occur within 1 mile of infrastructure components, and evaluate impacts to nesting raptors based on the distances provided in Appendix D of the ROD. Both EA1 and the SPODs evaluate the potential impacts to eagle and raptor nests that occur within 825 feet (1,200 for ferruginous hawks) of infrastructure components. This is likely based on the measure in Appendix D of the ROD that well locations, roads, ancillary facilities, and other surface structures requiring a repeated human presence will not be allowed [to be built] within 825 feet of active raptor nests or within 1,200 feet of active ferruginous hawk nests. This stipulation applies to Federal, state and private lands. Appendix D of the ROD contains additional stipulations, including that surface disturbing and potentially disruptive activities are prohibited within 1 mile of all eagle nests from February 1 through July 15. Appendix D contains similar stipulations for 17 other raptor species. While the temporal and spatial stipulations only apply to Federal lands, the EA1 contains no evaluation of nests greater than 825 feet (1,200 feet for ferruginous hawk) from potentially disruptive activities regardless of land ownership, including Federal. EA1 acknowledges that BLM does not have decision-making authority over infrastructure components on private lands; however, the EA analyzes impacts on all lands regardless of ownership (e.g., see EA1, p. 1-7). Therefore, EA1 should disclose and analyze impacts to all eagle nests within 5,280 feet of infrastructure components, instead of the current 825 feet, and evaluate raptors within their respective distances from Appendix D of the ROD.	Migratory Birds and Raptors	The CCSM Project FEIS analyzes impacts to raptors, including eagles, for the entire Project Area (p. 4.14-9 to 4.14-24), not just within the buffers and this analysis is incorporated into the EA through the tiering process. The EA provides additional analysis based on site-specific information provided in the SPODs. In addition, all of the measures in Appendix D of the CCSM Project ROD would be implemented for the Project as a whole.
19	6	U.S. Fish and Wildlife Service	The EA1 does not identify the amount of water depletions but states that, "The Proposed Action would not exceed water depletions considered by the USFWS in its BO" (p. 3-47). The biological opinion was based on 600 acre-feet; however, the SPOD for the Rock Road Quarry identifies up to 604 acre-feet might be used over a period of eight years (Table 4-7, p. 4-10). The difference in the two amounts is relatively minor but does underscore the importance for the project proponent to carefully monitor the amount of water used and report this to the BLM. If the amount of water used in the initial years of	Water	The BA included a letter from the Wyoming State Engineer's Office dated April 27, 2012 indicating the CCSM Project is an existing depletion and does not require a Platte River Recovery Agreement with the State of Wyoming to be covered under the Platte River Recovery Implementation Program. In addition, as identified in the BO and SPODs, depletions from the Platte River would not exceed 200 acre-feet within a given year during the construction period. Therefore, the amount of

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			construction exceeds the amounts identified in the SPODs, BLM should consider reinitiating consultation.		and extent of incidental take that may result from the Proposed Action would not exceed that analyzed by the USFWS in its BO. The EA has been updated to include this additional information.
20	7	National Wildlife Federation	As we stated in our scoping comments, we encourage BLM to examine more fully the potential environmental impacts of CCSM as a whole, particularly the potential loss of habitat for Greater sage-grouse, eagles and big game.	Wildlife	The EA impact analysis incorporates by reference the extensive analysis that was included in the CCSM Project FEIS. The Tiering Procedures contain a detailed description and flow chart explaining the NEPA tiering process to be used by the BLM in analyzing the SPODs. Following the Tiering Procedures, the CCSM Project FEIS analyzed and disclosed environmental impacts, including significant impacts to some environmental resources. The EA screens the SPODs against the analysis conducted in the CCSM Project FEIS to determine if there are any additional or new environmental impacts that were not previously analyzed and disclosed and whether or not these impacts are significant. The EA incorporates the analysis contained in the CCSM Project FEIS and ROD. As provided in the Tiering Procedures, this EA does not re-analyze the effects on resources that were fully analyzed in the project-wide CCSM Project FEIS.
21	7	National Wildlife Federation	NWF and WWF continue to stress that many of the potential impacts of CCSM have not yet been fully analyzed. The construction and operation of 1,000 turbines, ancillary facilities and almost 500 miles of roads on lands currently occupied by Greater sage-grouse, raptors, mountain plovers and mule deer will come at a cost to wildlife habitat and populations. The only real question is how severe the cost will be and whether effective actions can be taken to reduce wildlife impacts. Unfortunately, an honest discussion of the true nature of that cost is not included in the CCSM Final Environmental Impact Statement (FEIS). The CCSM FEIS glosses over the potential for harm with vague promises of mitigation resulting from as yet to be developed wildlife protection plans. Since it relies on that FEIS, the draft EA also fails to address the full impacts of CCSM.	Wildlife	This EA impact analysis incorporates by reference the extensive analysis that was included in the CCSM Project FEIS for the project including up to 1,000 wind turbine generators. The Tiering Procedures contain a detailed description and flow chart explaining the NEPA tiering process to be used by the BLM in analyzing the SPODs. Following the Tiering Procedures, the CCSM Project FEIS analyzed and disclosed environmental impacts, including significant impacts to some environmental resources. The EA screens the SPODs against the analysis conducted in the CCSM Project FEIS to determine if there are any additional or new environmental impacts that

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					were not previously analyzed and disclosed and whether or not these impacts are significant. The EA incorporates the analysis contained in the CCSM Project FEIS and ROD. As provided in the Tiering Procedures, this EA does not re-analyze the effects on resources that were fully analyzed in the project-wide CCSM Project FEIS. In addition, the Wildlife Protection and Monitoring Plan is included in Appendix G of ROD.
22	7	National Wildlife Federation	The proposed site for the CCSM project is in the midst of highly productive Greater sage-grouse habitat. State wildlife management agencies, along with the Bureau of Land Management (BLM) and the United States Forest Service (USFS), which administer most federal lands in the West, are taking steps to ensure the conservation of the Greater sage-grouse. BLM, working jointly with USFS, is preparing environmental impact statements (EISs) to address the effects of implementing Greater sage-grouse conservation measures on the lands they manage. We urge BLM to complete these sage-grouse EISs before making additional commitments to permit CCSM.	Greater Sage-Grouse	The CCSM Project is in compliance with Wyoming Sage-grouse executive order and the Rawlins Resource Management Plan (RMP) (BLM 2008) and therefore incorporates the RMP requirements for Greater Sage-Grouse.
23	7	National Wildlife Federation	This site also includes nesting concentration areas for raptors, including bald eagles and golden eagles. BLM has promised that both an Avian Protection Plan (APP) and an Eagle Conservation Plan (ECP) will be required before CCSM is permitted to go forward. To date, however, neither of these Plans has been completed. In April of this year, the United States Fish and Wildlife Service (USFWS) produced its Final Scoping Report on issues regarding eagle losses at CCSM. A draft EIS from USFWS, however, is not expected until next year at the earliest. Meanwhile USFWS is in the midst of reassessing its entire eagle management program including the issuance of take permits.	Migratory Birds and Raptors	An Avian Protection Plan (APP) and ECP are being prepared for the CCSM Project. The USFWS is preparing an EIS to determine whether to issue PCW an eagle take permit. Please refer to the Decision Record for the process for granting ROWs and notices to proceed.
24	7	National Wildlife Federation	BLM considers the potential impact to raptors as modest on a per-turbine basis, but there are an unprecedented number of turbines in this project, such that 150 to 210 raptor mortalities per year are forecast, including 46-64 golden eagle mortalities. Losing 46-64 eagles per year in such a slow-reproducing, territorial species could have major impacts on the local	Migratory Birds and Raptors	The CCSM Project FEIS analyzed the impacts to raptors, including eagles, for the CCSM Project as a whole (p.4.14-19 to 4.14-24). As required by the CCSM Project ROD, PCW, in consultation with USFWS, is developing an Eagle Conservation Plan (ECP) to avoid, minimize, and mitigate impacts to

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			breeding population, as well as the population of migrants traveling seasonally through the project area. CCSM could well turn the area into a population sink, killing more eagles than the area is able to replace. No proven methods of compensatory mitigation exist that can “replace” golden eagles lost to CCSM wind turbines. Published literature contains little information or data to support the possibility of avoiding or minimizing impacts on golden and bald eagles from wind turbines once they are constructed. Avoidance remains the best first step, according to USFWS raptor experts.		eagles for the CCSM Project. The USFWS is preparing an EIS to determine whether to issue PCW an eagle take permit.
25	7	National Wildlife Federation	Moreover, while details of the actual measures USFWS may require have not yet been determined, mitigation may require modifications to the project design, location of turbine arrays (including overall siting area), equipment specifications, number of turbines and other features of the project that could substantially alter the nature of the project and accordingly alter the magnitude of environmental impacts for bald and golden eagles, as well as other affected wildlife and resources.	Migratory Birds and Raptors	As identified in the SPODs, PCW worked in close cooperation with the Wyoming Game and Fish Department (WGFD), BLM, and the USFWS to develop survey protocols and avoidance, minimization and mitigation measures for wildlife species, including eagles. As required by the CCSM Project ROD, PCW, in consultation with USFWS, is developing an Eagle Conservation Plan (ECP) to avoid, minimize, and mitigate impacts to eagles for the CCSM Project. The USFWS is preparing an EIS to determine whether to issue PCW an eagle take permit.
26	7	National Wildlife Federation	Before BLM makes final decisions regarding pieces of CCSM, including the location of haul roads and other ancillary facilities, BLM must first determine whether the entire project site truly can accommodate 1,000 wind turbines. The agency cannot and should not do so without a complete understanding of how or whether the impacts to sage-grouse and eagles can be mitigated.	Migratory Birds and Raptors	This EA impact analysis incorporates by reference the extensive analysis that was included in the CCSM Project FEIS. The ROD determined that, “...wind energy development is appropriate within the 219,707-acre conceptual area of development to accommodate a 2, 00- to 3,000-megawatt (MW) project consisting of up to 1,000 turbines in the two sites...” (CCSM Project ROD p. 3-9). Following the Tiering Procedures, the CCSM Project FEIS analyzed and disclosed environmental impacts, including significant impacts to some environmental resources. The EA screens the SPODs against the analysis conducted in the CCSM Project FEIS to determine if there are any additional or new environmental impacts that were not previously analyzed and disclosed and whether or not these impacts are significant. The

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					EA incorporates the analysis contained in the CCSM Project FEIS and ROD. As provided in the Tiering Procedures, this EA does not re-analyze the effects on resources that were fully analyzed in the project-wide CCSM Project FEIS. Refer to the Decision Record for the process for granting ROWs and notices to proceed.
27	7	National Wildlife Federation	NWF and WWF are also concerned about impacts to other wildlife on the proposed CCSM site. The Rawlins Resource Management Plan (RMP) identifies much of the CCSM project area as being crucial yearlong habitat for mule deer. CCSM FEIS states that this area provides crucial habitats for elk, mule deer and pronghorn as well as important travel routes for big game seeking winter ranges or parturition areas outside the project area. In the CCSM FEIS, however, BLM admits that little is understood about the location and use of these big game migration corridors. Better information regarding these corridors should be obtained in order to determine whether impacts can be avoided or mitigated.	Big Game	The BLM is using the best available science in this impact analysis. As identified in Appendix D of the CCSM Project ROD, surface-disturbing and disruptive activities will not be allowed during the period of November 15 to April 30 in big game crucial winter range. In addition, the BLM is working closely with the WGFD and the Wildlife Protection and Monitoring Plan is included in Appendix G, which incorporates adaptive management principles and will be implemented for this project.
28	7	National Wildlife Federation	This project is proceeding when assessments of threats to wildlife are at best incomplete and in some cases deferred until a later time. BLM must accurately assess the magnitude of impacts, plan mitigation measures that might compensate in some way for these impacts, and then evaluate the efficacy of these mitigation measures, as required by the National Environmental Policy Act. We urge the agency to address these deficiencies before it makes additional commitments to CCSM.	Wildlife	The BLM is using the best available science in this impact analysis. This EA impact analysis incorporates by reference the extensive analysis that was included in the CCSM Project FEIS for wildlife. Following the Tiering Procedures, the CCSM Project FEIS analyzed and disclosed environmental impacts, including significant impacts to some environmental resources. The EA screens the SPODs against the analysis conducted in the CCSM Project FEIS to determine if there are any additional or new environmental impacts that were not previously analyzed and disclosed and whether or not these impacts are significant. The EA incorporates the analysis contained in the CCSM Project FEIS and ROD. As provided in the Tiering Procedures, this EA does not re-analyze the effects on resources that were fully analyzed in the project-wide CCSM Project FEIS. Appendix D of the CCSM ROD includes the Applicant Committed Measures, Applicant Committed Best

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					Management Practices, and Proposed Mitigation Measures for the CCSM Project. In addition, adaptive management principles will be implemented for this project.
29	8	Wyoming Game and Fish Department	Where infrastructure components overlay big game winter range, we recommend construction activities not occur from November 15 through April 30 to protect wintering big game species. In addition, as we have provided in the past, we recommend haul road design and maintenance consider means of facilitating big game passage across the haul road. Limiting vehicle speeds, removing snow berms, use of large culvert-type overpasses, and other features can help minimize impacts to ungulates.	Big Game	These mitigation measures addressing these issues are included in Appendix C in this EA which includes Applicant Committed Measures, Applicant Committed Best Management Practices, and Proposed Mitigation Measures (also included in the CCSM Project ROD as Appendix D).
30	8	Wyoming Game and Fish Department	Development should continue to recognize and adhere to appropriate stipulations for sage-grouse including non-core area stipulations of no surface occupancy within 0.25 miles of leks and avoiding human disturbance activities from March 15 to June 30 within 2 miles of active or occupied leks.	Sage-Grouse	These mitigation measures addressing these issues are included in Appendix C in this EA which includes Applicant Committed Measures, Applicant Committed Best Management Practices, and Proposed Mitigation Measures (also included in the CCSM Project ROD as Appendix D). The CCSM Project is in compliance with Wyoming Sage-grouse executive order and the Rawlins Resource Management Plan (RMP) (BLM 2008) and therefore incorporates the RMP requirements for Greater Sage-Grouse.
31	8	Wyoming Game and Fish Department	Concerning potential raptor issues, we recommend reviewing information provided by the USFWS and the upcoming development of the Eagle Management Environmental Impact Statement.	Migratory Birds and Raptors	Thank you for your comment. The BLM is a cooperating agency on the FWS EIS and the FWS is a cooperating agency on the BLM CCSM Project NEPA documents and as such both agencies will continue to coordinate to insure consistency. In addition, the USFWS is preparing an EIS to determine whether to issue PCW an eagle take permit.
32	8	Wyoming Game and Fish Department	To minimize impacts to the aquatic resources of nearby waterways, we recommend the following: - Accepted best management practices be implemented to ensure that all sediments and other pollutants are contained within the boundaries of the work area. Disturbed areas that are contributing sediment to surface waters as a result of project activities should be promptly re-vegetated to maintain	Water	These mitigation measures are included in Appendix C in this EA which includes Applicant Committed Measures, Applicant Committed Best Management Practices, and Proposed Mitigation Measures (also included in the CCSM Project ROD as Appendix D).

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			<p>water quality.</p> <p>- Equipment should be serviced and fueled away from steams and riparian areas. Equipment staging areas should be at least 300 feet from riparian areas.</p>		
33	8	Wyoming Game and Fish Department	<p>Preventing the spread of aquatic invasive species (AIS) is a priority for the State of Wyoming, and in many cases, the intentional or unintentional spread of organisms from one body of water to another would be considered a violation of State statute and Wyoming Game and Fish Commission Regulation. To prevent the spread of AIS, the following is required:</p> <ol style="list-style-type: none"> 1. If equipment has been used in a high risk infested water [a water known to contain Dreissenid mussels (zebra/quagga mussels)], the equipment must be inspected by an authorized aquatic invasive species inspector recognized by the state of Wyoming prior to its use in any Wyoming water during all times of year. 2. Any equipment entering the state by land from March through November (regardless of where it was last used), must be inspected by an authorized aquatic invasive species inspector prior to its use in any Wyoming water. 3. If aquatic invasive species are found, the equipment will need to be decontaminated by an authorized aquatic invasive species decontaminator. 4. Any time equipment is moved from one 4th level (8-digit Hydrological Unit Code) watershed to another within Wyoming, the following guidelines are recommended: DRAIN: Drain all water from watercraft, gear, equipment, and tanks. Leave wet compartments open to dry. CLEAN: Clean all plants, mud, and debris from vehicle, tanks, watercraft, and equipment. DRY: Dry everything thoroughly. In Wyoming, we recommend drying for 5 days in summer (June - August); 18 days in Spring (March - May) and Fall (September - November); or 3 days in Winter (December - February) when temperatures are at or below freezing. 5. Any equipment used in a Wyoming water that contains AIS, 	Invasive Species	As noted in your comment, the stated items are required by law and the CCSM Project will comply with all applicable regulations.

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			<p>must be inspected before use in another water. Species currently found in Wyoming waters include New Zealand mudsnail, Asian clam, and curly pondweed. Information on currently affected waters can be found at: http://wgfd.wyo.gov/web2011/Departments/Fishing/pdfs/AIS_WYWATER_MONITOR130005236.pdf</p>		