Scoping Summary Report

Chokecherry and Sierra Madre Wind Energy Project

Environmental Assessment for Phase I Wind Turbine Development

September 2014

BLM

High Desert District – Rawlins Field Office

Scoping Summary Report

September 2014

Chokecherry and Sierra Madre Wind Energy Project

Environmental Assessment for Phase I Wind Turbine Development

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ACRONYMS & ABBREVIATIONS

BLM	Bureau of Land Management
CCSM	Chokecherry and Sierra Madre
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO_2	carbon dioxide
EA	Environmental Assessment
EIS	Environmental Impact Statement
FONSI	Finding of No Significant Impact
KOP	key observation point
MW	megawatts
NEPA	National Environmental Policy Act
NRHP	National Register of Historic Places
PCW	Power Company of Wyoming
ROD	Record of Decision
U.S.C.	United States Code

CHAPTER 1. INTRODUCTION

In 2008, Power Company of Wyoming LLC (PCW) applied to the Bureau of Land Management (BLM) for right-of-way grants to construct, operate, maintain and decommission the Chokecherry and Sierra Madre (CCSM) Wind Energy Project on federal lands within the CCSM Project Site. On June 29, 2012, the Final Environmental Impact Statement (EIS) for the CCSM Project was issued, and on October 9, 2012, the Record of Decision (ROD) was signed. In the ROD, the BLM determined that more than 200,000 acres within the CCSM Project Site are suitable for wind energy development subject to the requirements described under the Selected Alternative. Subsequent tiered environmental assessments (EAs) are needed to analyze site-specific issues. The first to be analyzed was the infrastructure component EA which includes the Phase I Haul Road and Facilities, West Sinclair Rail Facility, and Road Rock Quarry. Scoping was held for the first EA from September 9 to November 4, 2013. The second EA will address the Phase I Wind Turbine Development. Scoping for the Phase I Wind Turbine Development EA was held from December 6, 2013 to January 14, 2014.

Scoping is part of the National Environmental Policy Act (NEPA) review process. During scoping, federal agencies solicit comments and information from the public, agencies, and tribes. The BLM conducted two scoping meetings in conjunction with the U.S. Fish and Wildlife Service (USFWS) on December 16 and 17, 2013 and posted the meeting materials on their website to provide opportunities for the public to learn more about the project, provide comments, and identify potential issues. The USFWS will be analyzing the impacts of issuing a permit for the take of eagles (protected under the Bald and Golden Eagle Protection Act) which may result from the operation of the CCSM Project. The BLM hosted one cooperating agency meeting on December 12, 2013. This Scoping Summary Report provides an overview of the scoping process and a summary of the scoping comments and the issues and concerns identified during the scoping process for the Phase I Wind Turbine Development.

1.1 DESCRIPTION OF PROPOSED PROJECT

PCW proposes to construct, operate, maintain, and decommission the CCSM Project, located in Carbon County, Wyoming. The CCSM Project consists of up to 1,000 wind turbines capable of generating approximately 2,000 to 3,000 megawatts (MW) of clean, renewable wind energy. The CCSM Project has a proposed life of 30 years after which, subject to market conditions, the CCSM Project may be repowered as necessary to continue its operations. The CCSM Project will provide enough electricity to power more than 790,000 households, resulting in a reduction in carbon dioxide (CO_2) emissions of 7 to 11 million tons per year.

The second EA includes the site-specific analysis for the Phase I Wind Turbine Development. The Phase I Wind Turbine Development for the CCSM Project consists of 500 wind turbines along with associated facilities and infrastructure designed to provide approximately 1,500 megawatts (MW) of clean, renewable wind energy. The Phase I Wind Turbine Development is located in the westernmost portions of the Chokecherry and Sierra Madre Wind Development Areas; each component has been micro-sited to avoid and minimize impacts to natural and cultural resources while maximizing the efficiency of the CCSM Project. In addition to the 500 wind turbines, the Phase I Wind Turbine Development includes approximately 170 miles of access roads, 65 miles of overhead collection and transmission lines, nine meteorological towers, two water stations, three long-term facilities (the Operations Center, Chokecherry Maintenance Building, and Sierra Madre Maintenance Building), and temporary facilities including the construction camp and laydown yards. The long-term facilities are required to operate and maintain the CCSM Project, while the temporary facilities will be used to meet the CCSM Project needs during construction.

1.2 PURPOSE OF SCOPING

Scoping is the process of actively soliciting input from the public and other interested federal, state, tribal, and local agencies. The BLM follows the public involvement requirements according to the Council on Environmental Quality (CEQ) regulations set forth in 40 Code of Federal Regulations (CFR) 1501.7, which states, "there should be an early and open process for determining the scope of issues to be addressed and for identifying the process for determining the scope of issues to be addressed during the planning process." During the scoping process, the BLM solicits comments from the public and relevant agencies, organizes and analyzes all of the comments received, and then distills the comments to identify the issues to be addressed during the planning process. The BLM and cooperating agencies consider comments provided during scoping and refine the issues and planning criteria, formulate alternatives, and conduct impact analyses. Therefore, public participation during the scoping period is a vital component to preparing a comprehensive and sound NEPA document. Scoping provides the public, tribes, and agencies opportunities for meaningful public involvement in the decision-making process.

CHAPTER 2. SUMMARY OF SCOPING MEETINGS AND COMMENTS

2.1 NOTIFICATION

Scoping for the Phase I Wind Turbine Development EA was initiated on December 4, 2013 and on December 6, 2013 the BLM issued a press release announcing the public scoping period. The press release summarized the EA and detailed ways the public could provide scoping comments.

As part of the notification process, the BLM distributed "storefront" flyers to community centers and local businesses in Rawlins and Saratoga, Wyoming announcing the public scoping meetings as well as through social media. PCW also publicized the scoping meetings and opportunities to comment via its website notices, a December 5, 2013 news release, and social media.

Several news articles about the scoping meetings were published in the local newspapers:

- December 5, 2013, Rawlins Daily Times, "Chokecherry moves forward." This article mentioned both public meetings and opportunities to comment.
- December 7, 2013, Rawlins Daily Times, "BLM hosts public meetings on Chokecherry development." This article mentioned both public meetings and opportunities to comment.
- December 11, 2013, Rawlins Daily Times, "BLM seeks public comments on Chokecherry." This article mentioned both public meetings and opportunities to comment.
- December 13, 2013, Rawlins Daily Times, Community calendar includes CCSM Project meeting notice.
- December 25, 2013, Saratoga Sun, "BLM and USFWS discuss Chokecherry wind farm." This article provided overview of public meetings and mentioned ongoing opportunities to comment.

The BLM sent an email on December 4, 2013 inviting cooperating agencies to the scoping meetings, as well as a cooperating agency meeting to be held on December 12, 2013. On December 11, 2013, the BLM sent a follow up email to cooperating agencies with the scoping meeting information for Phase I Wind Turbine Development. Appendix A lists the cooperating agencies and other interested parties the BLM notified about the scoping meetings.

2.1.1 Consultation and Coordination with Federal, State, and Local Governments

Regulations require BLM to coordinate and consult with federal, state, and local agencies about the potential of the proposed project and alternatives to affect sensitive resources. The coordination and consultation must occur in a timely manner and are required before any final decisions are made. Issues related to agency consultation may include biological resources, cultural resources, socioeconomics, and land and water management. Biological resource consultations apply to the potential for activities to disturb sensitive species or habitats. Cultural resource consultations apply to the potential for impacts to important cultural or archaeological sites. The BLM has initiated these coordination and consultation activities through the scoping process. To-date the following agencies will be participating as cooperating agencies on the CCSM Project EAs:

- Federal Agencies
  - Department of Agriculture (including the U.S. Forest Service)
  - Department of the Interior (including the U.S. Fish and Wildlife Service)

- State Agencies
  - State of Wyoming (including 12 departments)
- Local Agencies
  - Carbon County (including four departments and County Commissioners)
  - Little Snake River Conservation District
  - Medicine Bow Conservation District
  - Saratoga Encampment Rawlins Conservation District
- City of Rawlins
- Town of Saratoga

At the cooperators meeting in Rawlins on December 12, 2013, the following cooperating agencies attended: Carbon County, City of Rawlins, State of Wyoming, U.S. Fish and Wildlife Service, and Wyoming Department of Environmental Quality – Water Quality Division.

2.1.2 Tribal Government-to-Government Consultation

Section 106 of the National Historic Preservation Act (NHPA) (16 United States Code [U.S.C.] 470) requires federal agencies to take into account the effects that their approvals and federally funded activities and programs have on historic properties and traditional cultural properties. "Historic properties" include those properties included in, or eligible for, the National Register of Historic Places (NRHP) (36 CFR 800.16(1)(1)). BLM conducted Tribal consultation during development of the CCSM EIS as required by law and outlined in the ROD (BLM 2012) and will continue Tribal consultation throughout the site-specific EA process.

2.2 SCOPING MEETINGS

The BLM hosted two public scoping meetings: one in Rawlins, and one in Saratoga, Wyoming. Table 1 provides the dates, locations, and number of attendees at each scoping meeting, including cooperating agencies. Appendix B provides the display boards and informational materials the BLM presented to the public at the scoping meetings. In addition, PCW presented materials including an overview of the company, the CCSM Project, and the benefits of the CCSM Project; wildlife conservation activities and other biological and cultural resources information; three large-scale maps of the CCSM Project Area, Chokecherry Wind Development Area, and Sierra Madre Wind Development Area with the proposed wind turbine locations; and general information on wind turbines.

Table 1. Scoping Meetings Attendance

Meeting Location	Meeting Date/Time	Number of Attendees
Rawlins, Wyoming	December 16, 2013 4:00 p.m. to 6:30 p.m.	28
Saratoga, Wyoming	Tuesday, December 17, 2013 4:00 p.m. to 6:30 p.m.	37

The BLM, PCW, and USFWS presented information on the Phase I Wind Turbine Development at 4:30 p.m. and 6:00 p.m. on Monday, December 16. On Tuesday, December 17, the BLM, PCW, and USFWS presented the same information at 4:30 p.m.

For interested persons not able to attend the public meetings, the BLM posted all of the scoping meeting materials on their website, including the comment form and a fact sheet describing the Phase I Wind Turbine Development, as well as all of the maps presented at the scoping meetings.

2.2.1 Summary of Attendees

Members of the public, cooperating agencies, and other interested parties attending the December 16, 2013 meeting in Rawlins included the City of Rawlins, representatives from the Carbon County Planning Commission, private interest groups (The Nature Conservancy), media (Rawlins Daily Times), private contracting companies and business owners, ranchers, and other members of the community.

Members of the public, cooperating agencies, and other interested parties attending the December 17, 2013 meeting in Saratoga included representatives from the Wyoming Department of Environmental Quality, Wyoming Game and Fish Department, the City of Saratoga Planning Commission, Saratoga/Platte Valley Chamber of Commerce, the University of Missouri, media (Associated Press, Bigfoot Radio, and Saratoga Sun), private interest groups (Voices of the Valley, Trout Unlimited, and Biodiversity Conservation Alliance), private contracting companies and business owners, ranchers, and other members of the community.

2.3 SUMMARY OF SCOPING COMMENTS

BLM received a total of 14 comment letters during the public scoping period either via hand delivery, email, U.S. Postal Service mail or at the scoping meetings. These comment letters contained a total of 109 individual comments. Most of the comments BLM received were from agencies and nongovernmental organizations.

Following the close of the public scoping period, comments were compiled and analyzed to identify issues and concerns. Each comment was identified, reviewed, and entered into a spreadsheet. As comments were entered, contact information for the commenter was added, or updated, to the mailing list to ensure that all interested parties would receive information throughout the EA process.

Once the individual comments were compiled in the spreadsheet, comments were categorized by the topic or resource area they addressed (e.g., wildlife, socioeconomic, etc.). The comprehensive list of scoping comments was sorted by resource and is presented in Appendix C. Some of the scoping comments were eliminated from consideration in the EA because they addressed issues outside of the scope of detailed analyses or the comment stated an opinion (e.g., I oppose/support this project).

CHAPTER 3. IDENTIFICATION OF ISSUES

Information gained during scoping assists the BLM in identifying the potential environmental issues, and mitigation measures associated with development of the proposed project. As previously discussed, the scoping process provides a mechanism for narrowing the scope of issues so that the EA can focus the analysis on areas of high interest and concern. A majority of the comments were related to impacts to wildlife resources, especially Greater Sage-Grouse, bald eagles, and big game, socioeconomic issues, and cumulative impacts. The following summarizes the key concerns expressed during scoping.

Continental Divide National Scenic Trail

- Concern was expressed about visual impacts to the Continental Divide National Scenic Trail and how the project complies with the CDNST Comprehensive Plan and Rawlins RMP direction for the CDNST.

Cultural Resources

- Concern was expressed about visual impacts to contributing segments of the Overland Trail and the protection of Key Observation Points (KOPs).
- Commenters expressed concern regarding impacts to the Pine Grove Stage Station. Additionally, commenters suggested that the Pine Grove Landscape should be evaluated for the National Register of Historic Places as a Rural Historic Landscape.

Laws and Regulations

- Commenters requested compliance with the Federal Land Policy and Management Act and the Migratory Bird Treaty Act, as well as conformance with the Land Use Plan and Carbon County Conditional Use Permit.

Mitigation

- Commenters requested data used to support mitigation decisions be made available for public review.
- Commenters suggested specific mitigation measures to minimize impacts on-site and off-site.

NEPA Process

- Commenters requested that a wider range of action alternatives be considered for analysis, including alternative project locations and configurations, and reducing the number of turbines.
- Concern was expressed about the need for more comprehensive environmental analysis over preparing a site-specific EA for Phase I. Some commenters requested the BLM continue close coordination with the USFWS and their preparation of the eagle take permit EIS, while others requested the BLM and USFWS prepare a joint EIS.
- Commenters identified specific projects for the BLM to evaluate with regard to cumulative impacts.
- Some commenters expressed concern that the scoping period date was too short due to the holidays.

Reclamation

- Concern was expressed about the appropriate reclamation of disturbance areas and specific concerns with regard to the Reclamation Plan.

Socioeconomic

- Commenters expressed concern that the influx of non-resident workers needed for construction will disrupt the local housing market, and the impacts on schools, public works, the longevity of local economies, and tourism.

Soils

- Commenters suggested consolidating the entire site layout (roads, soil piles, transmission lines, and turbines) to prevent unnecessary reclamation.

Travel, Transportation, and Access

- Commenters requested an analysis of impacts from roads and access points necessary for access to wind turbines and arrays.
- Commenters expressed concern about making site-specific comments without access to the project area.

Visual Resources Management

- Concern was expressed about the impacts to panoramic vistas near Bridger Pass, Atlantic Rim, Ferris/Green Mountains, the Elk Mountains and the Snowy Range.

Wildlife

- Concern was expressed about adequately assessing impacts to Greater Sage-Grouse and their habitat, raptor species, bats, fisheries, mountain plover, prairie dogs, and big game (mule deer, elk, and antelope) migration patterns.
- Commenters requested additional clarification about how the Phase I Wind Turbine Development will comply with policies and regulations aimed at species protection and conservation. Commenters recommended changing out turbines if technologies with lower impacts to birds and bats become available.
- Commenters suggested that findings of on-going monitoring programs for Greater Sage-Grouse, mule deer, raptors, aquatic resources, and other species be considered as specific proposals are developed for wind turbine placement.
- Commenters requested an analysis of noise impacts and traffic impacts on fisheries, big game habitat, and areas of public land utilized by hunters and fisherman.
- Concerns were expressed related to the cumulative impacts analysis, specifically Greater Sage-Grouse and bald eagle impacts.
- Commenters suggested additional mitigation be considered and implemented for impacts to wildlife, specifically bald eagles.

CHAPTER 4. ACTIVITIES FOLLOWING SCOPING

The NEPA process provides opportunities for public input. Following the scoping period, the EA will be prepared incorporating information received from the public during the scoping period. When the EA is complete, BLM will prepare, if appropriate and the analysis supports the determination, a draft Finding of No Significant Impact (FONSI) and will make the final EA and unsigned FONSI available for public review and comment. During the review period, the public can comment on key issues and the adequacy of the documents. Following the review period, the BLM will prepare the Decision Record, if appropriate, and make it available for public review. Table 2 summarizes these opportunities and provides an anticipated schedule for these activities.

Table 2. Opportunities for Public Participation in the NEPA Process

Steps in the Process	Anticipated Date
Publication of the EA	3rd Quarter 2014
Close of EA Public Review Period	3rd Quarter 2014
Publication of the FONSI, if supported by analysis in the Infrastructure Component EA	3rd Quarter 2014
Publication of the Decision Record	Fall 2014

EA Environmental Assessment
FONSI Finding of No Significant Impact
NEPA National Environmental Policy Act

CHAPTER 5. REFERENCES

Bureau of Land Management (BLM). 2012. Record of Decision for the Chokecherry and Sierra Madre Wind Energy Project and Approved Visual Resource Management Plan Amendment. October.

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Chokecherry and Sierra Madre Wind Energy Project

Environmental Assessment for Phase I Wind Turbine Development

Appendix A

Notification List

APPENDIX A NOTIFICATION LIST

Table A-1 identifies the cooperating agencies and other interested parties that the Bureau of Land Management notified via email about the Chokecherry and Sierra Madre Wind Energy Project Environmental Assessment for Phase I Wind Turbine Development.

Table A-1. Notification List

Name	Email Address	Affiliation
Dave Allison	dlallison@ubtanet.com	Association of Conservation Districts
Bill Nation	billnation@carbonwy.com	Carbon County
Cal Rerucha	calrerucha@carbonwy.com	Carbon County
John Espy	johnespy@carbonwy.com	Carbon County
John Johnson	johnjohnson@carbonwy.com	Carbon County
Kristy Rowan	kristyrowan@carbonwy.com	Carbon County
Leo Chapman	leochapman@carbonwy.com	Carbon County
Lindy Glode	lindyglode@carbonwy.com	Carbon County
Sidney Fox	sidneyfox@carbonwy.com	Carbon County
Sue Jones	suejones@carbonwy.com	Carbon County
Thomas Powell	thomaspowell@carbonwy.com	Carbon County
Amy Bach	amybach@rawlins-wyoming.com	City of Rawlins (City Attorney)
Dan Massey	danmassey@rawlins-wyoming.com	City of Rawlins (City Manager)
John Zieger	mayor@saratogawyo.org	City of Saratoga
Justin Garrison	justin@medbowcd.org	Medicine Bow Conservation District
Ken Besel	kbesel@union-tel.com	Medicine Bow Conservation District
Debra Arnold	debra.arnold2@wy.usda.gov	Saratoga Encampment Rawlins Conservation District
Joseph Parsons	joe.sercd@gmail.com	Saratoga Encampment Rawlins Conservation District
Kimber Wichmann	kimber.wichmann@wyo.gov	State of Wyoming
Colin McKee	colin.mckee@wyo.gov	State of Wyoming (Governor's Office)
Jerimiah Rieman	jerimiah.rieman@wyo.gov	State of Wyoming (Governor's Office)
Shawn Reese	shawn.reese@wyo.gov	State of Wyoming (Governor's Office)
Mark Kot	kotm@sweet.wy.us	Sweetwater County (Planning Department)
Alex Schubert	alex_schubert@fws.gov	U.S. Fish and Wildlife Service
Clint Riley	clint_riley@fws.gov	U.S. Fish and Wildlife Service
Dave Carlson	dave_e_carlson@fws.gov	U.S. Fish and Wildlife Service
Kevin Kritz	kevin_kritz@fws.gov	U.S. Fish and Wildlife Service
Mark Sattelberg	mark_sattelberg@fws.gov	U.S. Fish and Wildlife Service
Melanie Fullman	mfullman@fs.fed.us	U.S. Fish and Wildlife Service
Michael Dixon	michael_d_dixon@fws.gov	U.S. Fish and Wildlife Service
Nathan Darnall	nathan_darnall@fws.gov	U.S. Fish and Wildlife Service
Pam Repp	pam_repp@fws.gov	U.S. Fish and Wildlife Service
Robert Segin	robert_segin@fws.gov	U.S. Fish and Wildlife Service
Tyler Abbott	tyler_abbott@fws.gov	U.S. Fish and Wildlife Service

Table A-1. Notification List

Name	Email Address	Affiliation
Tom Florich	tflorich@fs.fed.us	U.S. Forest Service
Tony Koch	ajkoch@fs.fed.us	U.S. Forest Service
Allory Deiss	allory@uwyo.edu	University of Wyoming
Jean Dickinson	jdickinson@vermillionranchlp.com	Wyoming Association of Conservation Districts
Timothy Morrison	tjmorkin@yahoo.com	Wyoming Association of Conservation Districts
Chris Wichmann	cwichmann@state.wy.us	Wyoming Department of Agriculture
Luke Esch	luke.esch1@wyo.gov	Wyoming Department of Environmental Quality
Mark Conrad	mconra@wyo.gov	Wyoming Department of Environmental Quality
Todd Parfitt	tparfi@wyo.gov	Wyoming Department of Environmental Quality
Greg Hiatt	greg.hiatt@wgf.state.wy.us	Wyoming Game and Fish Department
Mary Flanderka	mary.flanderka@wgf.state.wy.us	Wyoming Game and Fish Department
Matthew Fry	matthew.fry@wgf.state.wy.us	Wyoming Game and Fish Department
Rick Huber	rick.huber@wgf.state.wy.us	Wyoming Game and Fish Department
Scott Gamo	scott.gamo@wgf.state.wy.us	Wyoming Game and Fish Department
Tony Mong	tony.mong@wgf.state.wy.us	Wyoming Game and Fish Department
Will Schultz	will.schultz@wyo.gov	Wyoming Game and Fish Department
Susan Child	schild@wyo.gov	Wyoming Office of State Lands and Investments
James Stafford	james.stafford@wyo.gov	Wyoming State Geological Survey
Judy Wolf	jwolf@state.wy.us	Wyoming State Historic Preservation Office
Mary Hopkins	mhopki@state.wy.us Mary.Hopkins@wyo.gov	Wyoming State Historic Preservation Office
Richard Currit	rcurri@state.wy.us Richard.Currit@wyo.gov	Wyoming State Historic Preservation Office
Christy Christensen	cchris@state.wy.us	Wyoming State Parks, Historic Sites, and Trails

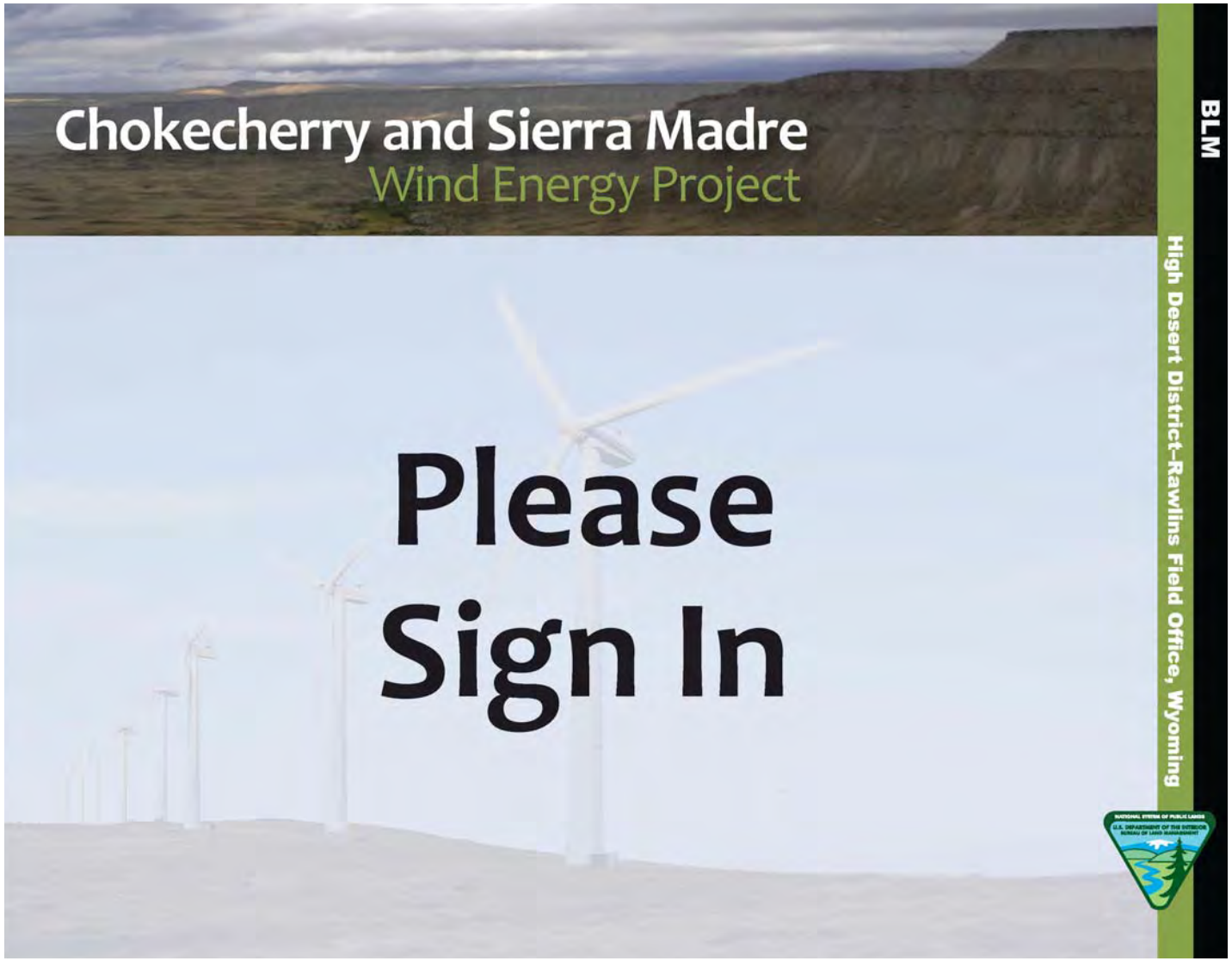
Chokecherry and Sierra Madre Wind Energy Project

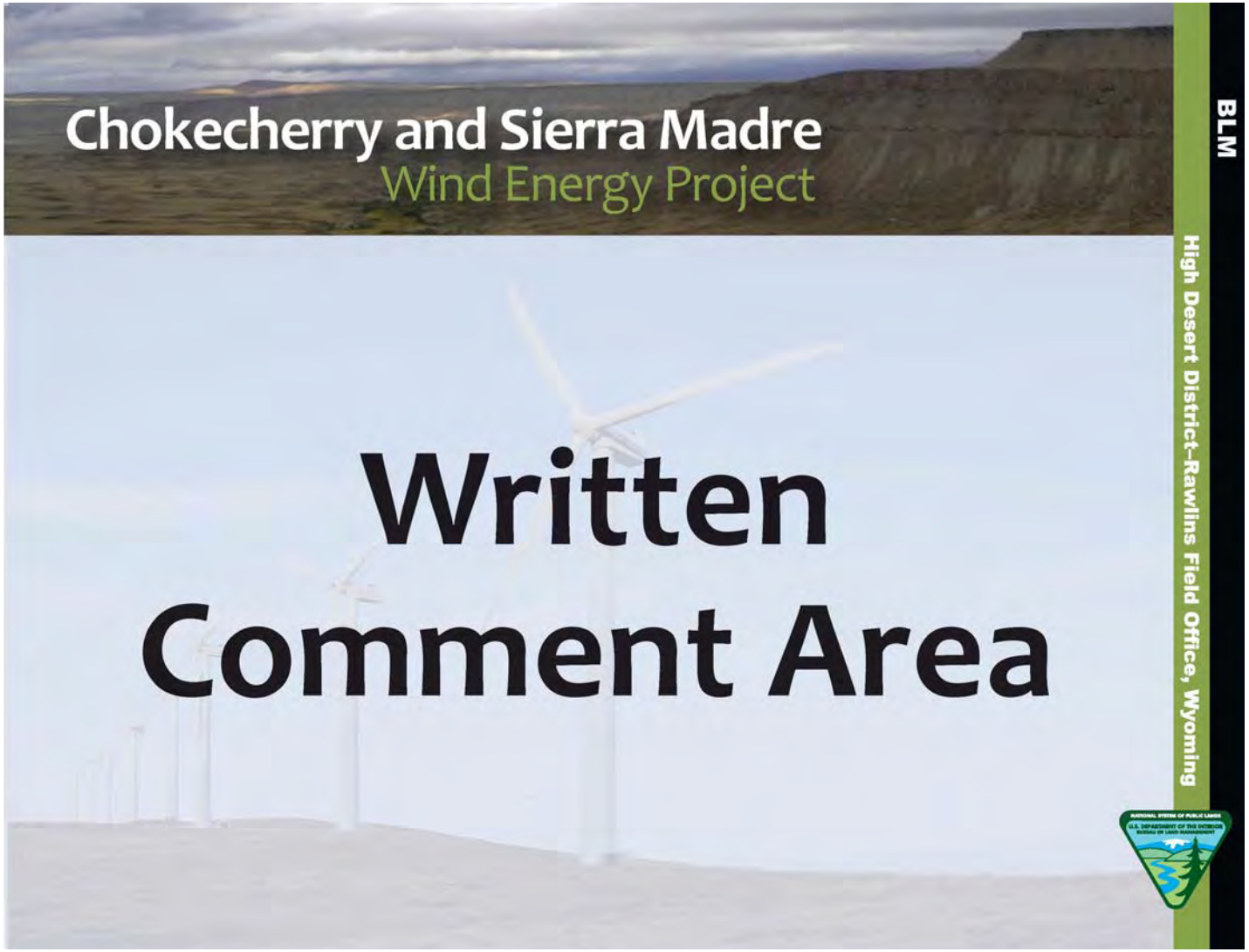
Environmental Assessment for Phase I Wind Turbine Development

Appendix B

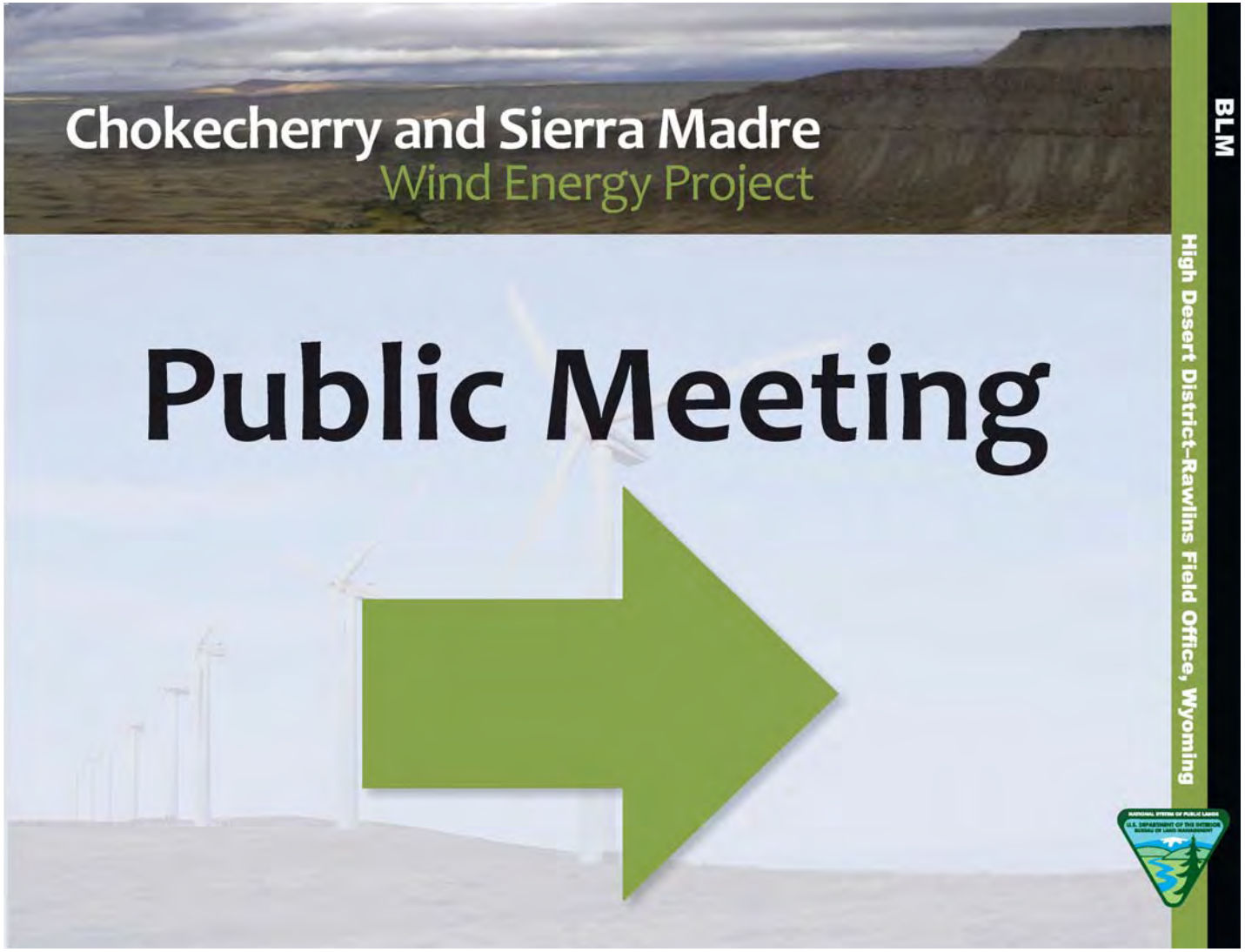
Scoping Meeting Materials

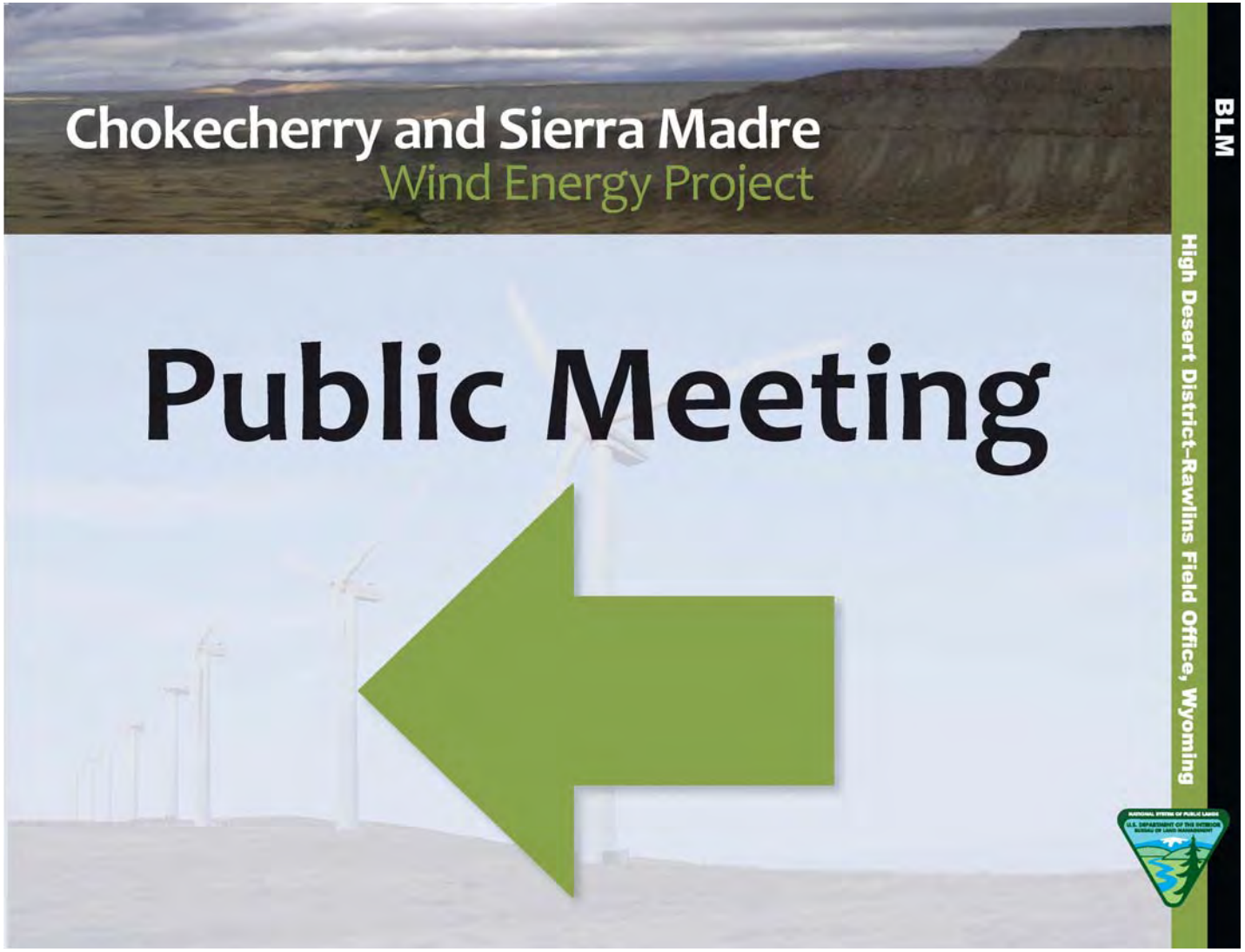
APPENDIX B SCOPING MEETING MATERIALS




Chokecherry and Sierra Madre
Wind Energy Project
Written
Comment Area
BLM
High Desert District–Rawlins Field Office, Wyoming

Chokecherry and Sierra Madre
Wind Energy Project
Place
Comments Here
BLM
High Desert District–Rawlins Field Office, Wyoming


Chokecherry and Sierra Madre
Wind Energy Project
Public Meeting
BLM
High Desert District–Rawlins Field Office, Wyoming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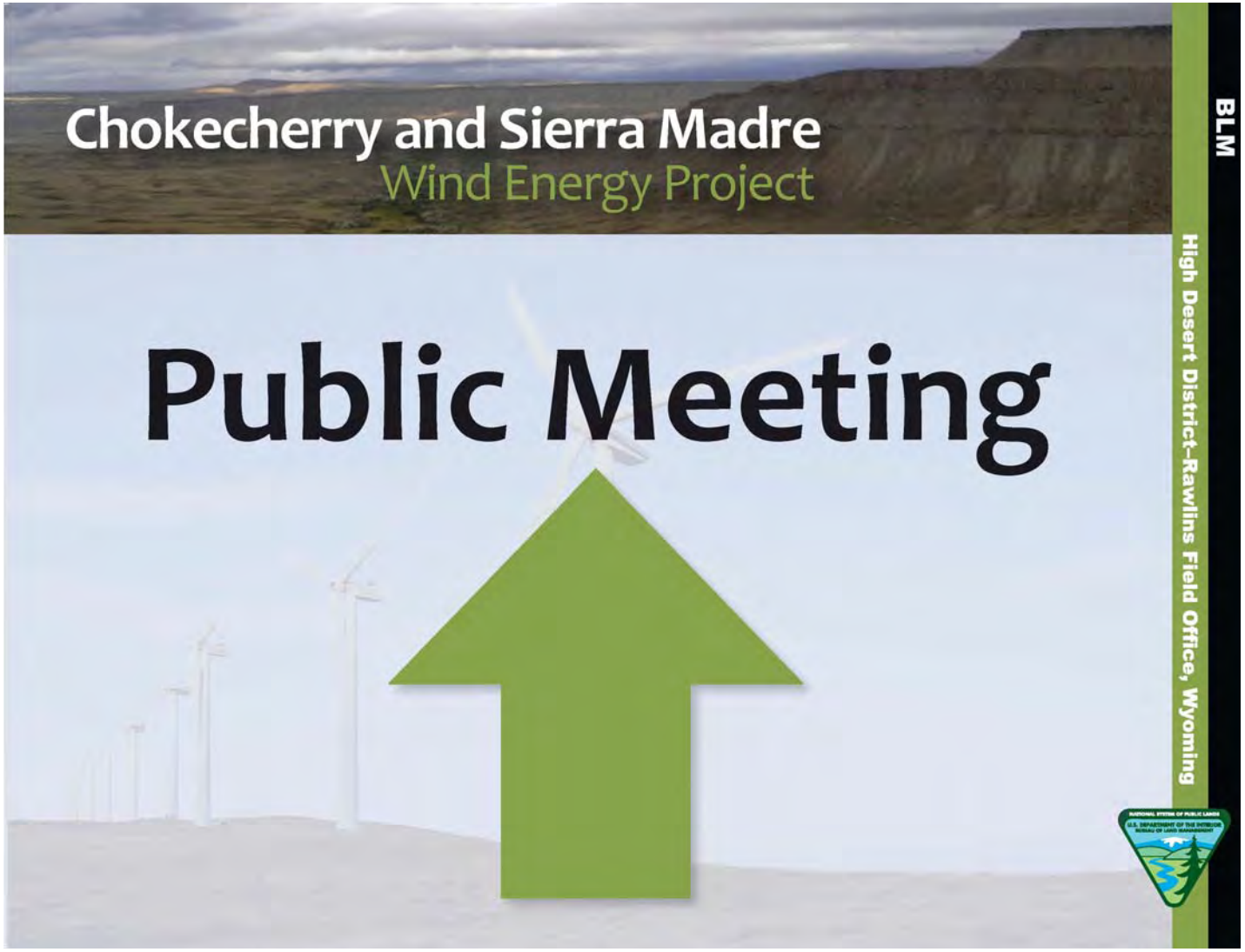
BLM
High Desert District–Rawlins Field Office, Wyoming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Chokecherry and Sierra Madre
Wind Energy Project

BLM

High Desert District-Rawlins Field Office, Wyoming

Site-specific Environmental Assessment for Phase I Wind Turbine Development

The Bureau of Land Management (BLM) Rawlins Field Office is accepting scoping comments for a site-specific environmental assessment for Phase I Wind Turbine Development for the Chokecherry and Sierra Madre Wind Energy Project (CCSM). The CCSM Record of Decision determined that over 200,000 acres within the CCSM Project Area are suitable for wind energy development subject to the requirements described under the Selected Alternative, but did not identify individual turbine or infrastructure component locations. Subsequent tiered environmental assessments (EAs) are needed to analyze site-specific issues. The first analyzed is the infrastructure component EA, which was available for scoping from September 9 through November 4. The second EA will address the Phase I Wind Turbine Development. Please complete and submit this comment form at the public scoping meetings. You may also return this form by mail to the address on the reverse side. Fold this form on the lines with the return address showing, tape it closed, affix a stamp, and mail. You may attach additional pages. Comments may also be submitted via facsimile: 307-328-4224, or by e-mail: blm_wy_pcw_windfarm@blm.gov. Please include "Phase I Wind Turbine Development Scoping Comment" in the subject line. Your comment must be received by January 14, 2014 to be considered in the EA. For your comments to be the most effective, the BLM suggests the following guidelines:

- Be specific. Give defined reasons, not broad statements or opinions.
- Share site-specific observations, data, or knowledge.
- Detail important environmental and community factors.
- Be timely. Comments must be received by January 14, 2014 to be considered in the environmental assessment.

If you would like to be on our mailing list, but have no comments or questions, please complete the contact information below.

_____

_____

_____

_____

_____

_____

_____

_____

Please provide your contact information. If you would like to be on the mailing list, please check the box on the reverse side and submit this form.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

NAME _____ TITLE _____

ORGANIZATION: _____

MAILING ADDRESS: _____

CITY, STATE, ZIP CODE _____

E-MAIL: _____ PHONE _____

Thank you for your interest and participation!

FOLD HERE SECOND

AFFIX STAMP

Chokecherry and Sierra Madre Wind Energy Project
Bureau of Land Management
Rawlins Field Office
Attn: Heather Schultz, Project Manager
P.O. Box 2407
1300 N. Third St.
Rawlins, WY 82301-2407

FOLD HERE FIRST

Chokecherry and Sierra Madre Wind Energy Project Mailing List

To have your name added or removed from our mailing list for this project, please check the appropriate box. Be sure to fill out the contact information on the reverse side. We will continue to send project-related announcements unless you ask us to remove your name from our mailing list.

☐ Yes, add my name to the mailing list to receive future information ☐ No, please remove my name from your mailing list

Additional project information and supporting documents are available on the project website at:

http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/Chokecherry.html

Chokecherry and Sierra Madre
Wind Energy Project

BLM

High Desert District-Rawlins Field Office, Wyoming

Welcome

In 2008, Power Company of Wyoming LLC (PCW) applied to the Bureau of Land Management (BLM) for right-of-way grants to construct, operate, maintain and decommission the Chokecherry and Sierra Madre Wind Energy Project (CCSM) on federal lands within the CCSM Project Site. On June 29, 2012, the Final Environmental Impact Statement (EIS) for the CCSM Project was issued, and on October 9, 2012, the Record of Decision (ROD) was signed. In the ROD, the BLM determined that more than 200,000 acres within the CCSM Project Site are suitable for wind energy development subject to the requirements described under the Selected Alternative.

The CCSM EIS and ROD did not identify individual turbine or infrastructure component locations. Subsequent environmental assessments (EAs) tiered to the EIS will analyze site-specific plans of development. The first EA to be analyzed is for the infrastructure components and scoping was held from September 9 to November 4, 2013. The second EA will address the Phase I Wind Turbine Development. Scoping for the second EA will occur from December 6, 2013 through January 14, 2014.

Scoping is part of the National Environmental Policy Act (NEPA) review process. During scoping, federal agencies solicit comments and information from the public, agencies, and tribes. The BLM is conducting two scoping meetings to provide an opportunity for you to learn more about the project, provide comments, and identify potential issues. The BLM encourages your participation and is providing you opportunities to ask questions, express any concerns, and submit your comments. The scoping period will close January 14, 2014.

Scoping Meetings

December 16, 2013
Jeffrey Center
315 W. Pine St.
Rawlins, WY
4-6:30 p.m.*

December 17, 2013
Platte Valley Community Center
210 W. Elm Ave.
Saratoga, WY
4-6:30 p.m.*

**Each meeting will include presentations at 4:30 and 5:30 p.m.*

Site-specific Environmental Assessment for Phase I Wind Turbine Development

The Phase I Wind Turbine Development for the CCSM Project consists of 500 wind turbines along with associated facilities and infrastructure designed to provide approximately 1,500 megawatts (MW) of clean, renewable wind energy. The Phase I Wind Turbine Development is located in the westernmost portions of the Chokecherry and Sierra Madre Wind Development Areas; each component has been micro-sited to avoid and minimize impacts to natural and cultural resources while maximizing the efficiency of the CCSM Project. In addition to the 500 wind turbines, the Phase I Wind Turbine Development includes approximately 170 miles of access roads, 65 miles of overhead collection and transmission lines, nine meteorological towers, two water stations, three long-term facilities (the Operations Center, Chokecherry Maintenance Building, and Sierra Madre Maintenance Building), and temporary facilities including the construction camp and laydown yards. The long-term facilities are required to operate and maintain the CCSM Project, while the temporary facilities will be used to meet the CCSM Project needs during construction.

How to Provide Comments

Please complete a comment form and place it in the comment box or give it to a BLM representative at the scoping meeting. Comments can also be submitted in the following ways and must be received by January 14, 2014 to be considered in the EA:

By facsimile: 307-328-4224

By email: blm_wy_pcw_windfarm@blm.gov

By U.S. Mail:

Bureau of Land Management
Rawlins Field Office
Heather Schultz, Project Manager
P.O. Box 2407
1300 N. Third St.
Rawlins, WY 82301

Before including your address, phone number, e-mail, or other personal identifying information in your comment, please be aware that your entire comment, including your personal identifying information, may be publicly available at any time. While you may request we withhold your personal information from public view, we cannot guarantee we will be able to do so.

Making Substantive Comments

Substantive comments help ensure important issues are identified and addressed in the EA.

- Be specific. Give defined reasons, not broad statements or opinions.
- Share site-specific observations, data, or knowledge.
- Detail important environmental and community factors.
- Be timely. Comments must be received by January 14, 2014.

Additional project information is available on the project website at: http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/Chokecherry.html

Site-specific NEPA Tiering Analysis (to be performed)

1. PCW Submits Site-specific Plans of Development
2. 30-Day Scoping Period
3. Draft Environmental Assessment (EA) Tiered to the Environmental Impact Statement
4. EA Comment Period
5. Incorporate Comments
6. Issue EA, Finding of No Significant Impact, Decision Record
7. 30-Day Appeal Period

Site-specific Environmental Assessments	
Haul Road and Facilities for Phase I	EA 1 9/2013 - 6/2014
West Sindair Rail Facility	
Road Rock Quarry	
Phase I Wind Turbine Development	EA 2 12/2013 - 9/2014
Phase II Wind Turbine Development (including Haul Road and Facilities for Phase II)	EA 3 (dates to be determined)

BLM

High Desert District–Rawlins Field Office, Wyoming

Chokecherry and Sierra Madre
Wind Energy Project

BLM

High Desert District–Rawlins Field Office, Wyoming

Keys to Making Effective Comments:

- Be specific. Give defined reasons, not broad statements or opinions.
- Share site-specific observations, data, or knowledge.
- Detail important environmental and community factors.
- Be timely. Comments must be received by January 14, 2014 to be considered in the environmental assessment.

Please Send Comments to:

Bureau of Land Management
Rawlins Field Office
Heather Schultz, Project Manager
P.O. Box 2407
1300 N. Third St.
Rawlins, WY 82301

E-mail: blm_wy_pcw_windfarm@blm.gov

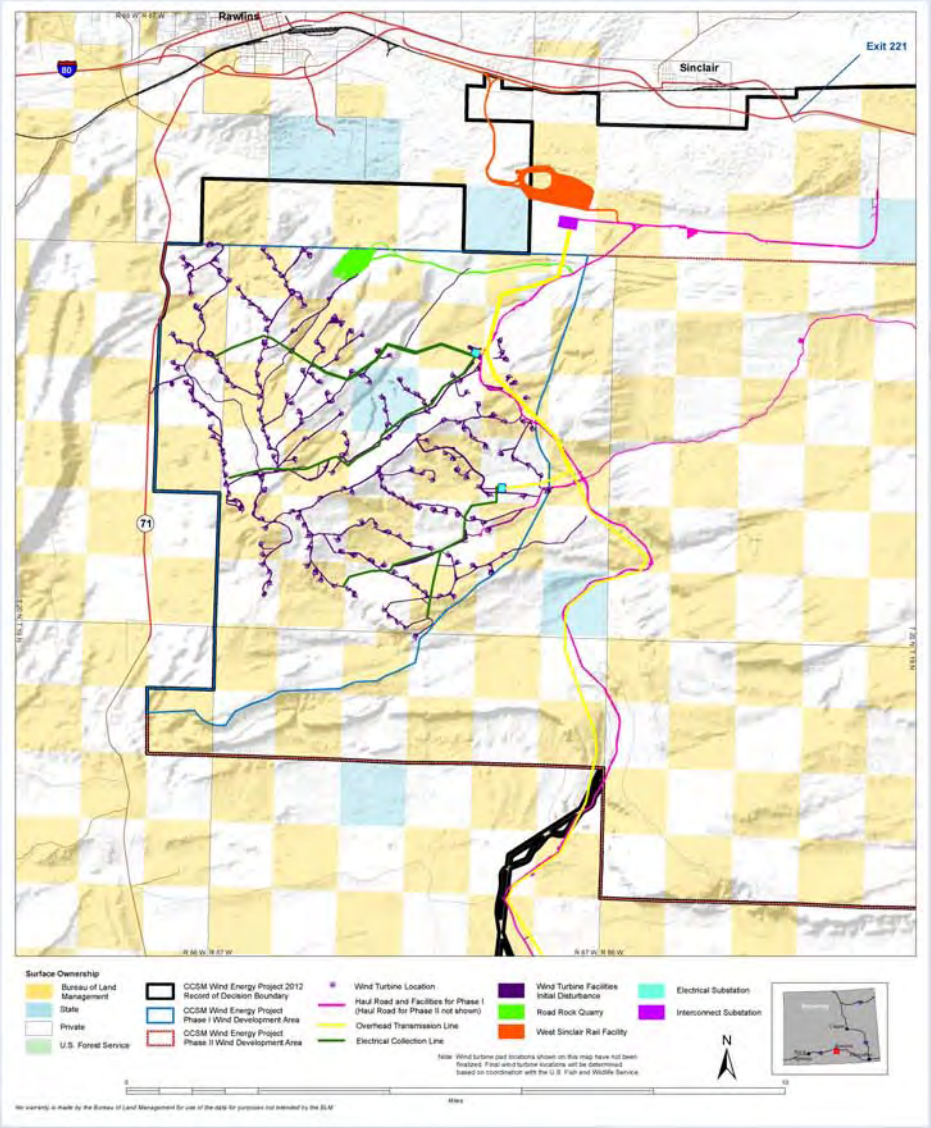
Facsimile: 307-328-4224

Project website: http://blm.gov/wy/st/en/info/NEPA/documents/rfo/Chokecherry.html

Chokecherry and Sierra Madre
Wind Energy Project

BLM

Chokecherry Wind Development Area



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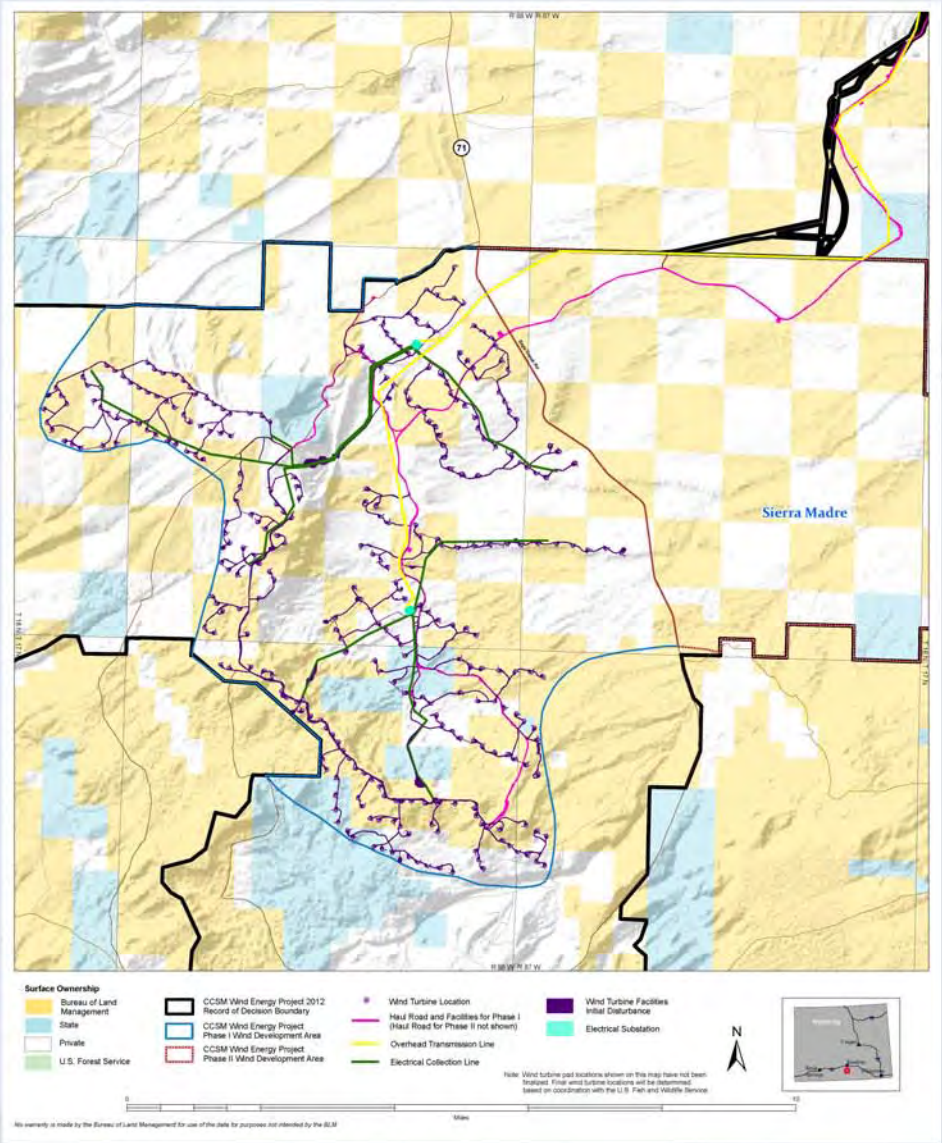
Chokecherry and Sierra Madre
Wind Energy Project

BLM

Sierra Madre Wind Development Area



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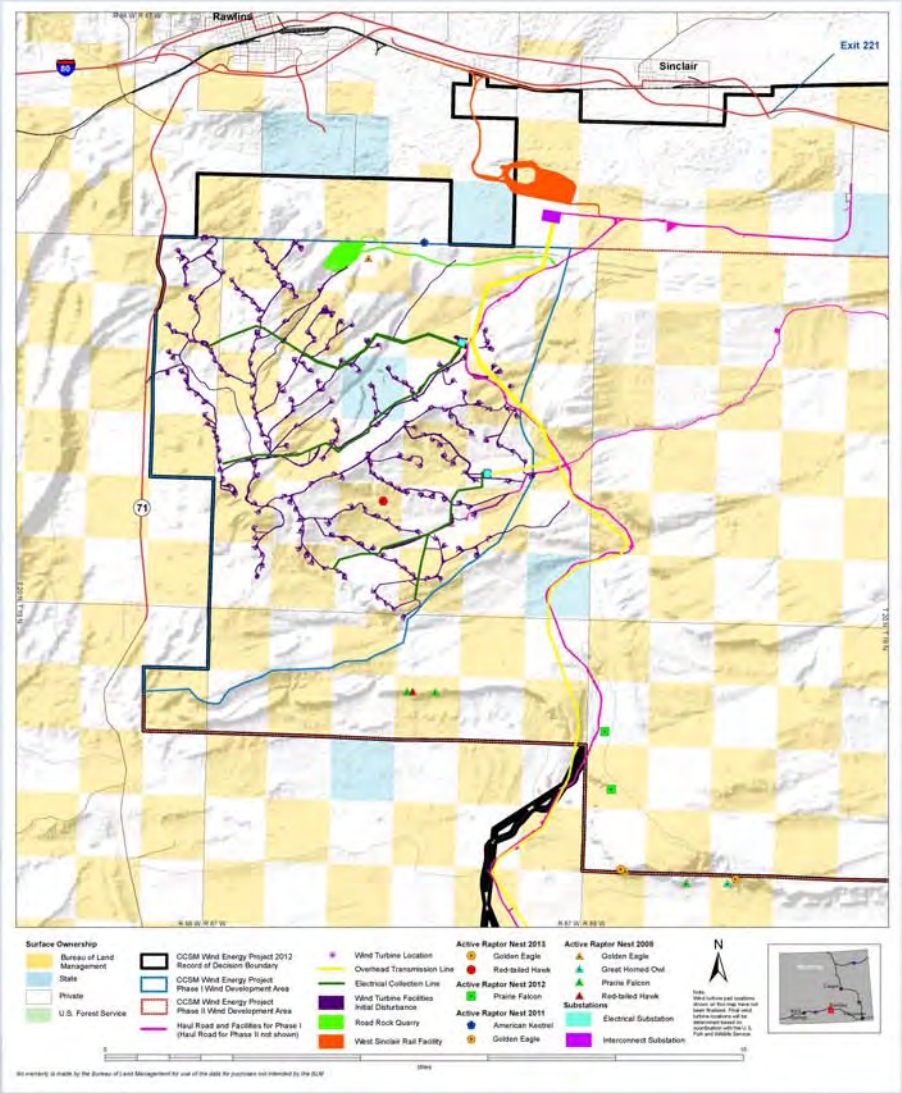
Chokecherry and Sierra Madre
Wind Energy Project

BLM

Chokecherry Wind Development Area Raptors



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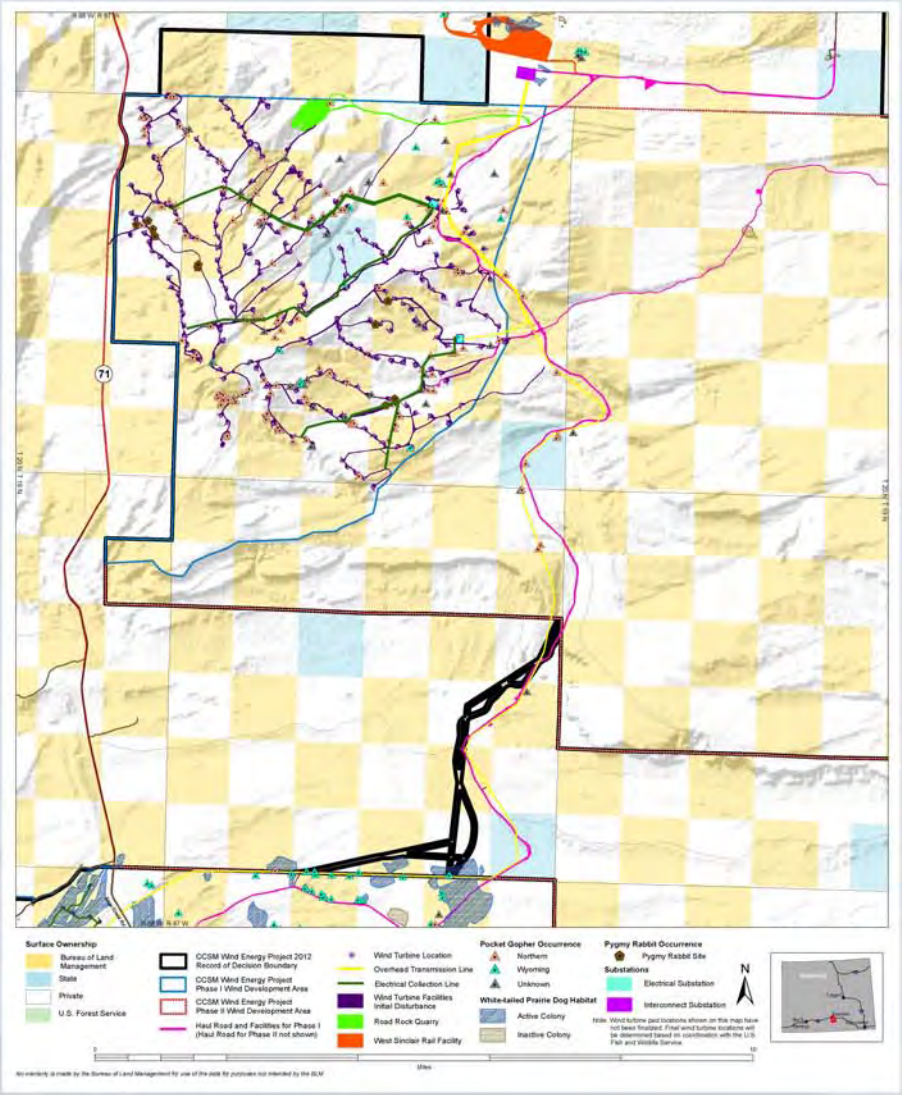
Chokecherry and Sierra Madre
Wind Energy Project

BLM

Chokecherry Wind Development Area
Small Mammals

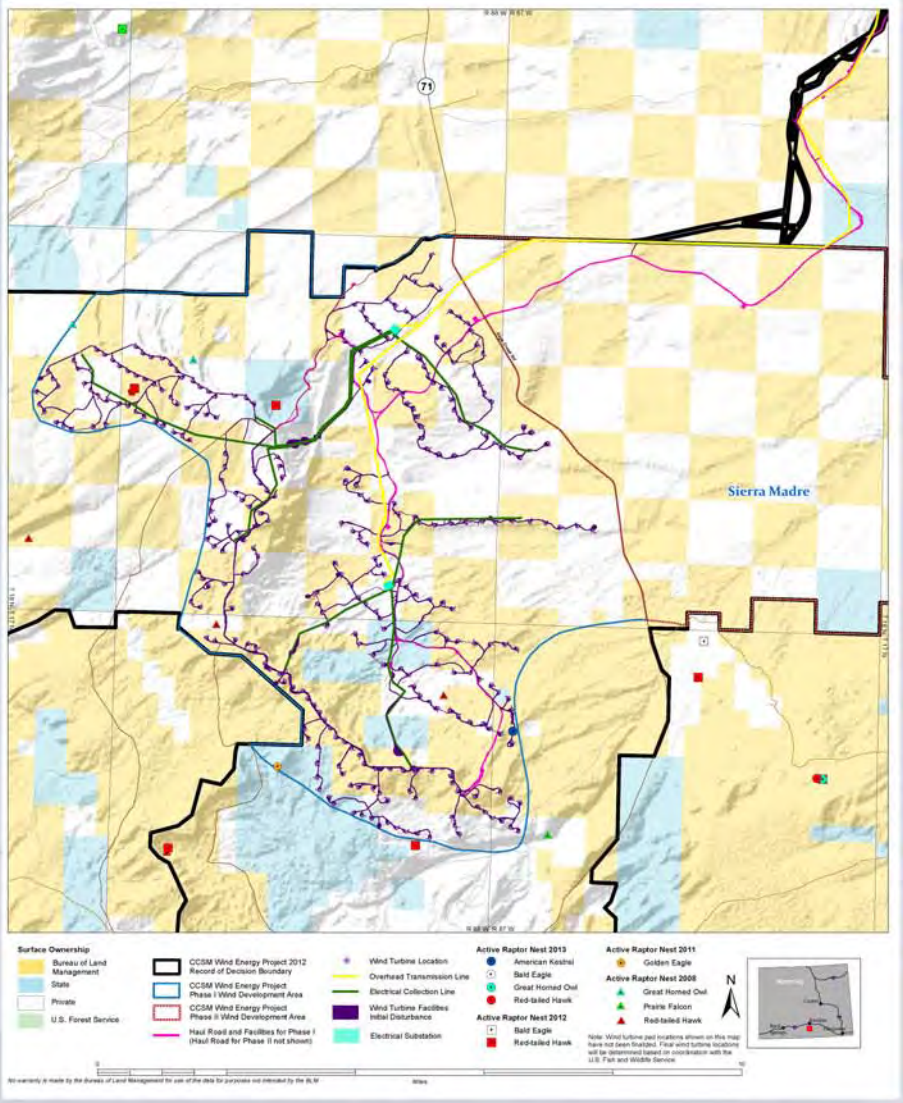


High Desert District–Rawlins Field Office, Wyoming

Chokecherry and Sierra Madre
Wind Energy Project

BLM

Sierra Madre Wind Development Area Raptors

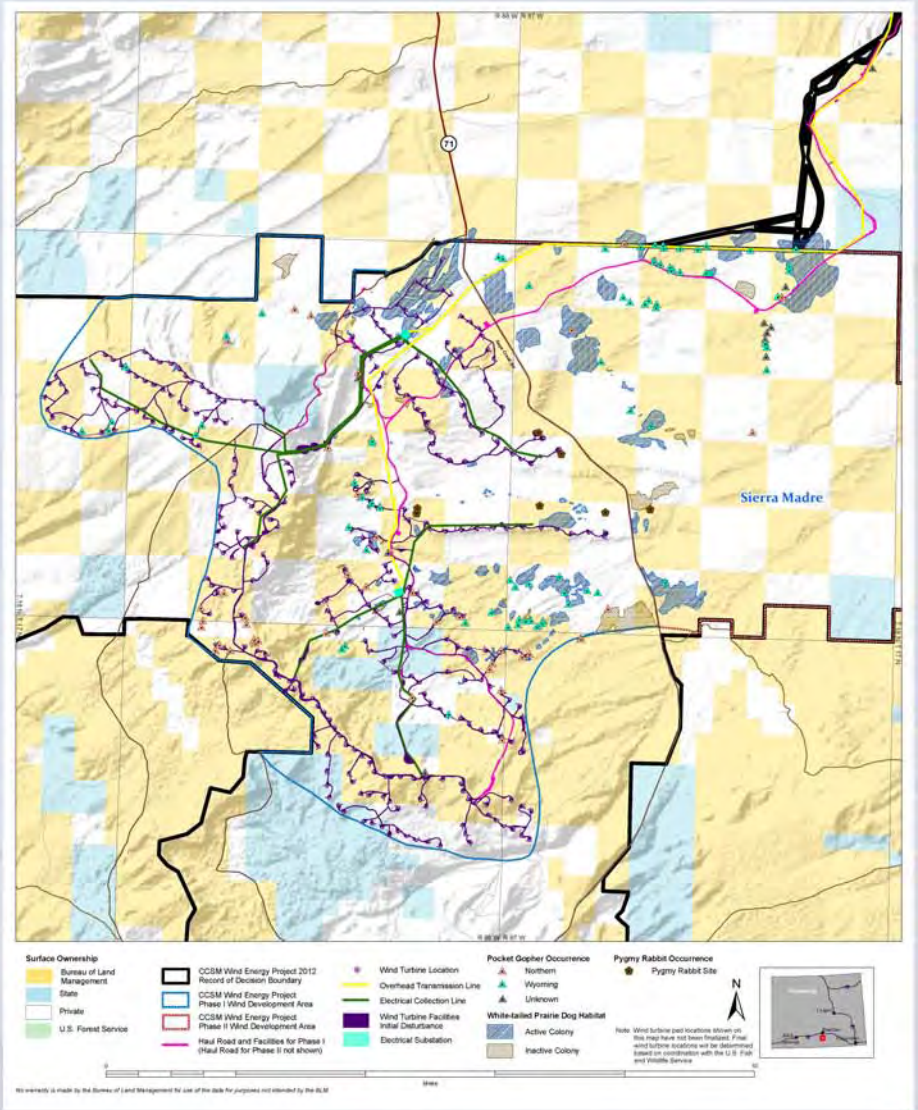


High Desert District–Rawlins Field Office, Wyoming

Chokecherry and Sierra Madre
Wind Energy Project

BLM

Sierra Madre Wind Development Area
Small Mammals



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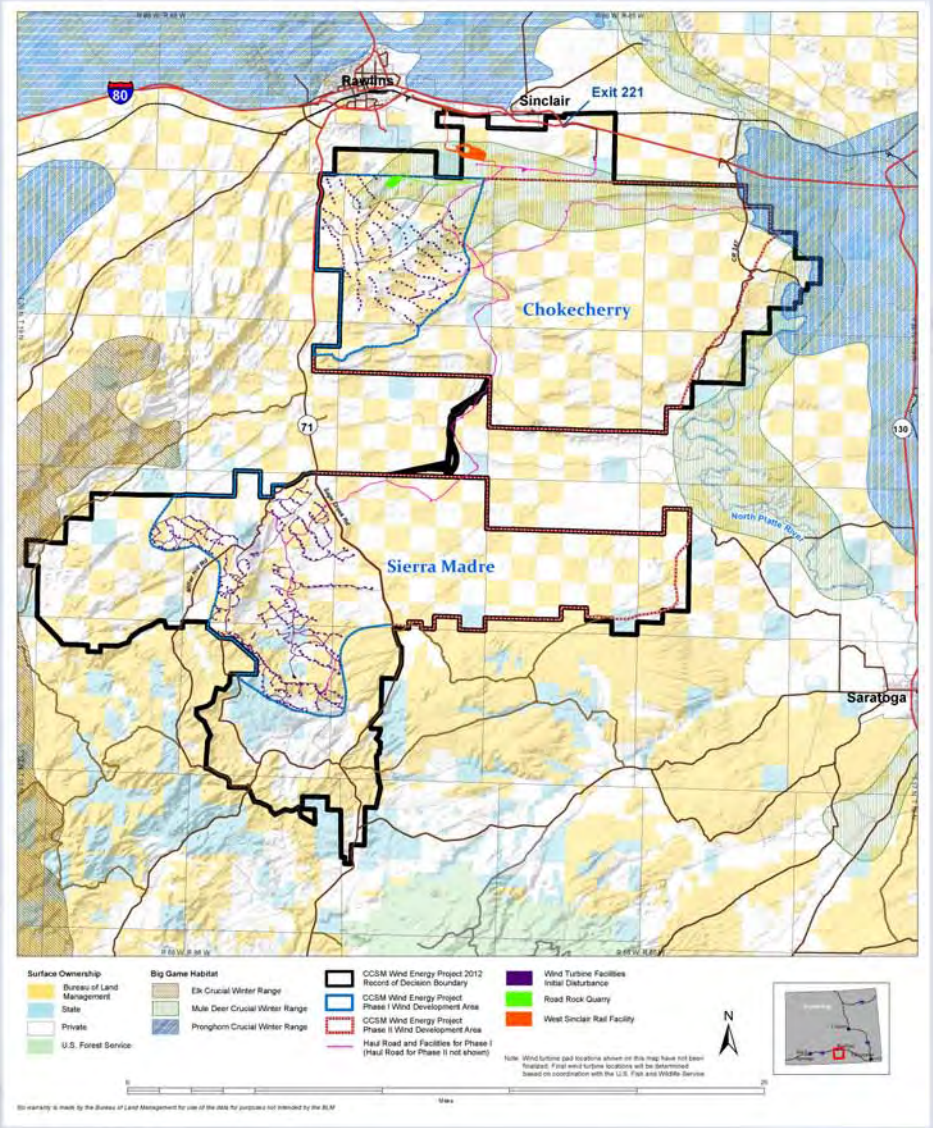
Chokecherry and Sierra Madre
Wind Energy Project

BLM

Big Game



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Chokecherry and Sierra Madre
Wind Energy Project

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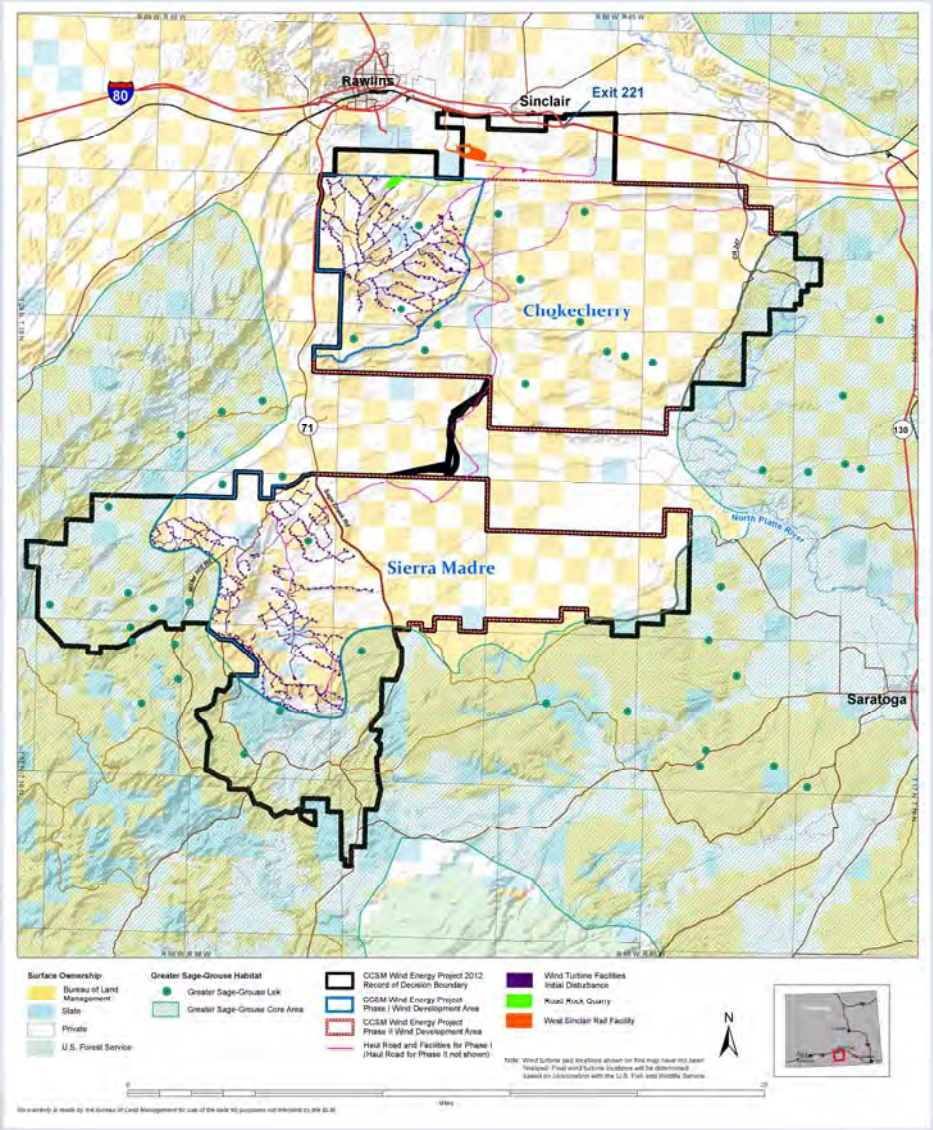
Greater Sage-Grouse



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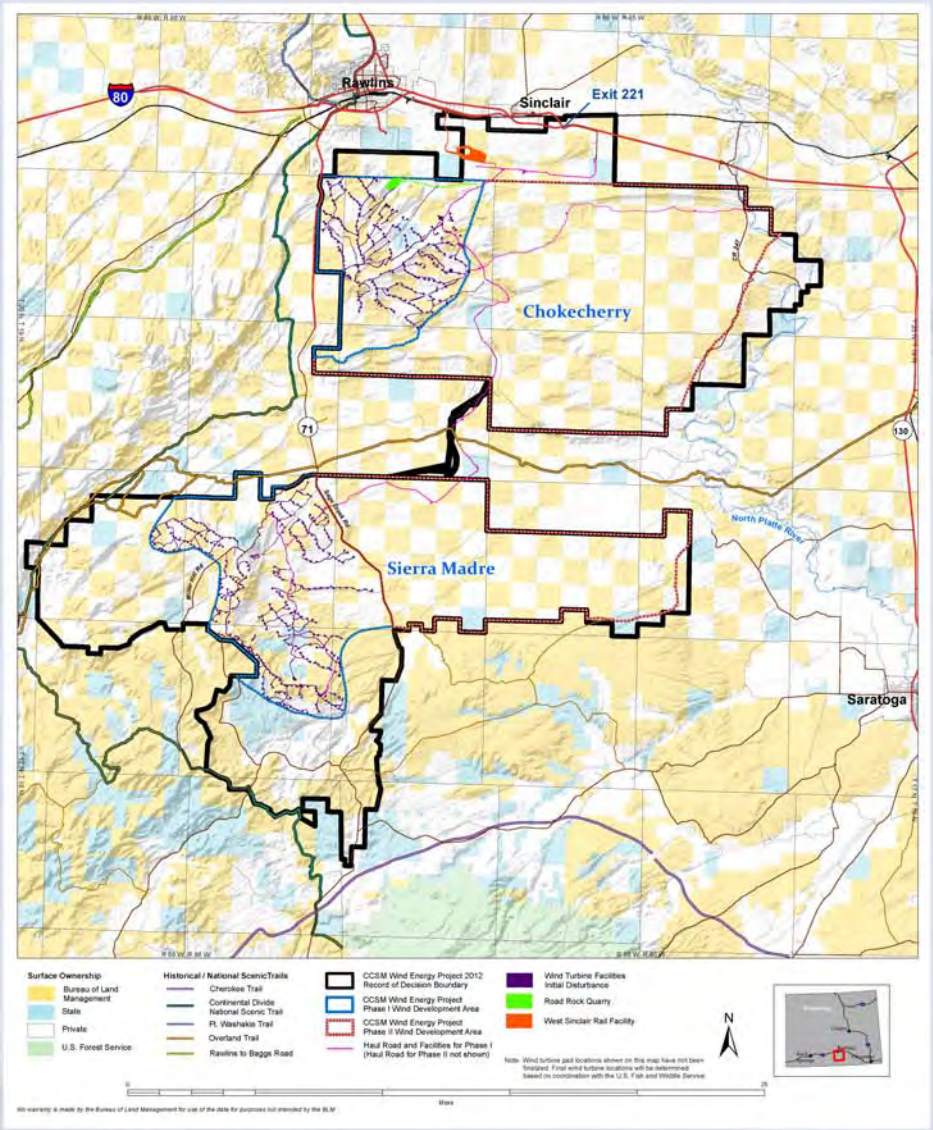
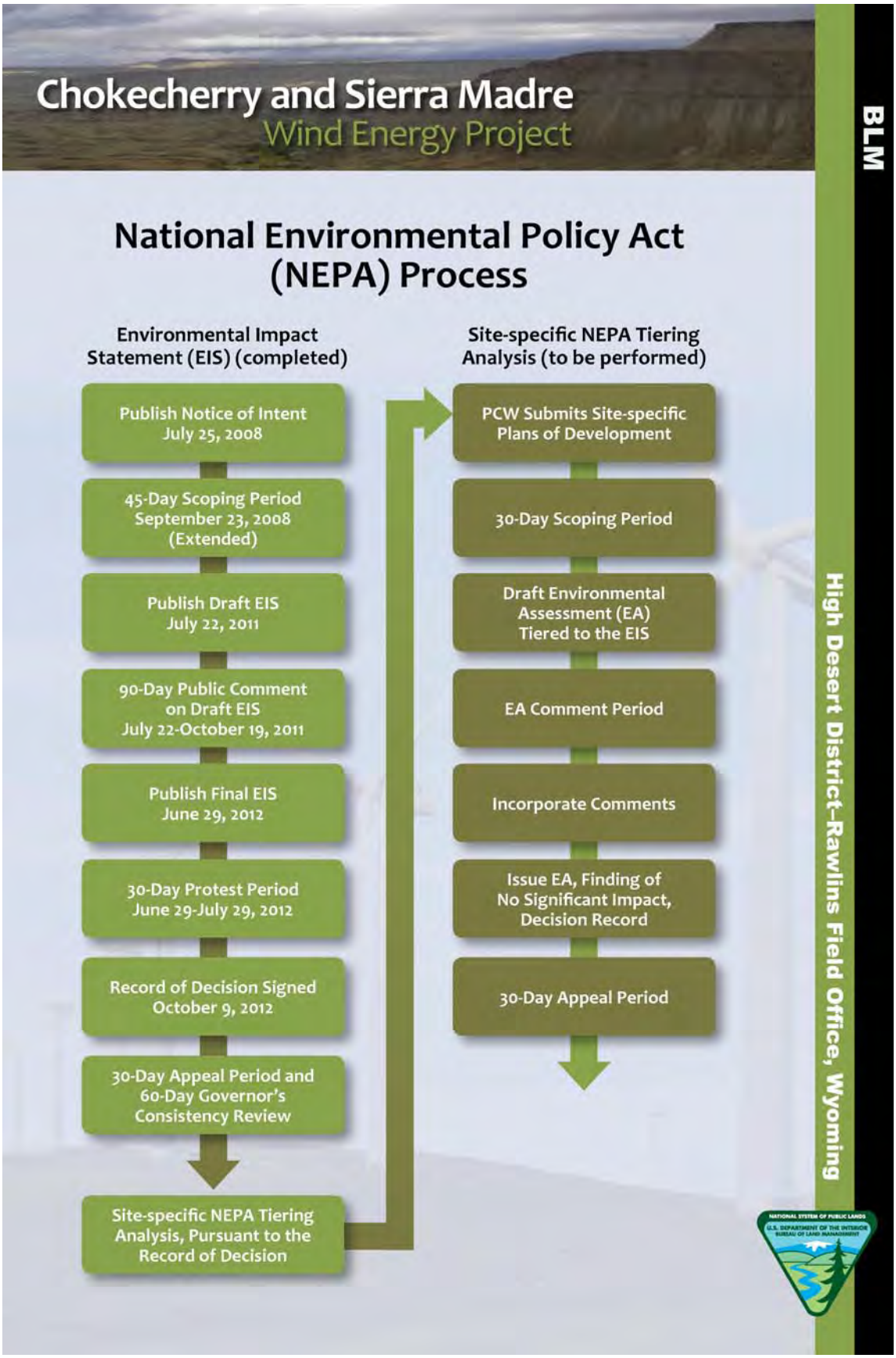
Chokecherry and Sierra Madre
Wind Energy Project

BLM

Historic and Scenic Trails



High Desert District–Rawlins Field Office, Wyoming


Chokecherry and Sierra Madre
Wind Energy Project
BLM
National Environmental Policy Act (NEPA) Process
Environmental Impact Statement (EIS) (completed)
Publish Notice of Intent July 25, 2008
45-Day Scoping Period September 23, 2008 (Extended)
Publish Draft EIS July 22, 2011
90-Day Public Comment on Draft EIS July 22-October 19, 2011
Publish Final EIS June 29, 2012
30-Day Protest Period June 29-July 29, 2012
Record of Decision Signed October 9, 2012
30-Day Appeal Period and 60-Day Governor's Consistency Review
Site-specific NEPA Tiering Analysis, Pursuant to the Record of Decision
Site-specific NEPA Tiering Analysis (to be performed)
PCW Submits Site-specific Plans of Development
30-Day Scoping Period
Draft Environmental Assessment (EA) Tiered to the EIS
EA Comment Period
Incorporate Comments
Issue EA, Finding of No Significant Impact, Decision Record
30-Day Appeal Period
High Desert District-Rawlins Field Office, Wyoming

Chokecherry and Sierra Madre
Wind Energy Project

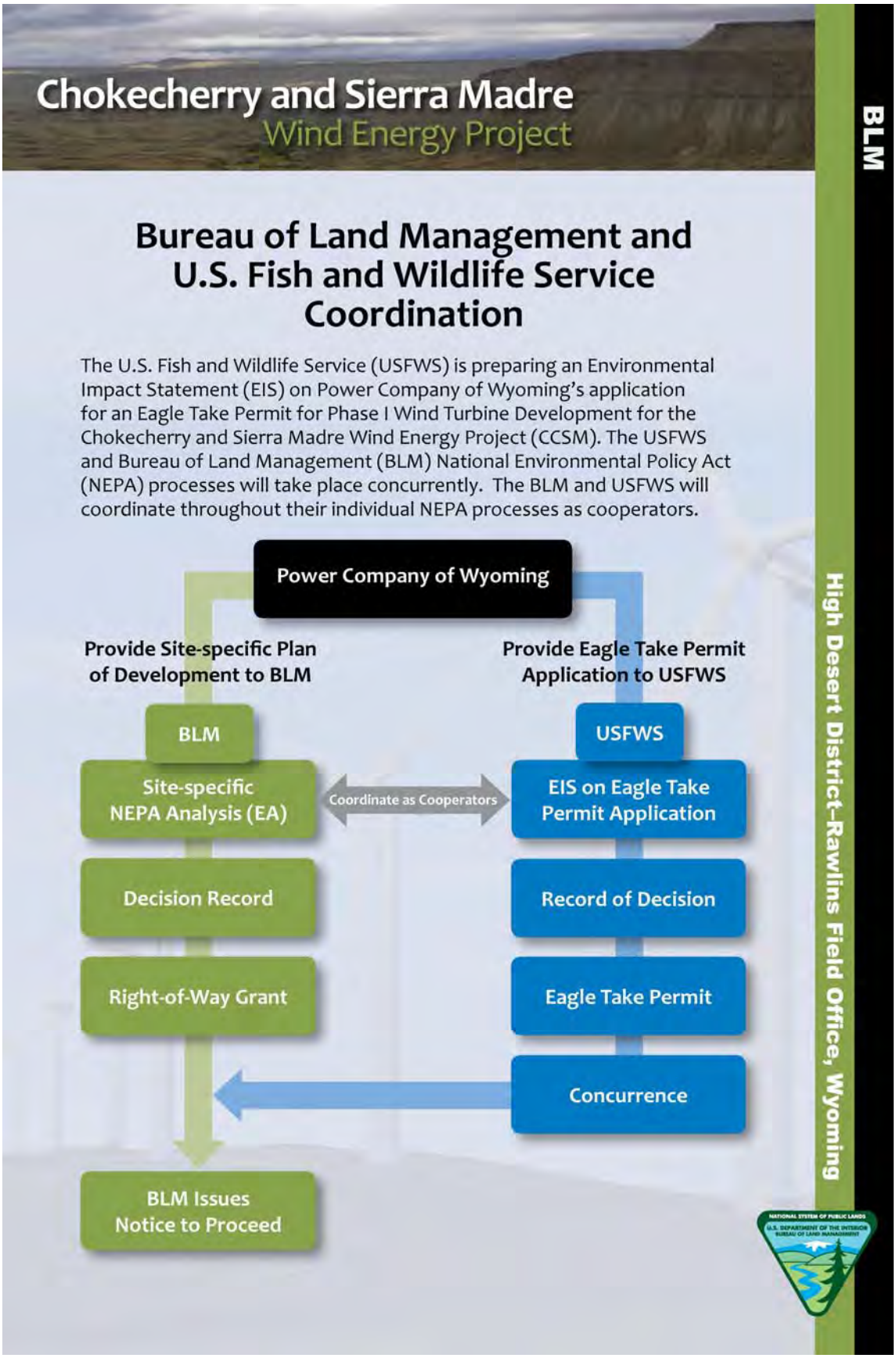
BLM

Site-specific Environmental Assessment for Phase I Wind Turbine Development

The Chokecherry and Sierra Madre Wind Energy Project (CCSM) Environmental Impact Statement (EIS) and Record of Decision determined that over 200,000 acres within the CCSM Project Area are suitable for wind energy development subject to the requirements described under the Selected Alternative, but did not identify individual turbine or infrastructure component locations. Subsequent environmental assessments (EAs) tiered to the EIS will analyze site-specific plans of development. The first EA to be analyzed is for the infrastructure components and scoping was held from September 9 to November 4, 2013. The second EA will address the Phase I Wind Turbine Development. Scoping for the second EA will occur from December 6, 2013 through January 14, 2014.

SITE-SPECIFIC ENVIRONMENTAL ASSESSMENTS	
Haul Road and Facilities for Phase I	Environmental Assessment 1 (Sept. 2013 – June 2014)
West Sinclair Rail Facility	
Road Rock Quarry	
Phase I Wind Turbine Development	Environmental Assessment 2 (Dec. 2013 – Sept. 2014)
Phase II Wind Turbine Development (including Haul Road and Facilities for Phase II)	Environmental Assessment 3 (dates to be determined)

High Desert District-Rawlins Field Office, Wyoming


Chokecherry and Sierra Madre
Wind Energy Project
BLM
Bureau of Land Management and U.S. Fish and Wildlife Service Coordination
The U.S. Fish and Wildlife Service (USFWS) is preparing an Environmental Impact Statement (EIS) on Power Company of Wyoming's application for an Eagle Take Permit for Phase I Wind Turbine Development for the Chokecherry and Sierra Madre Wind Energy Project (CCSM). The USFWS and Bureau of Land Management (BLM) National Environmental Policy Act (NEPA) processes will take place concurrently. The BLM and USFWS will coordinate throughout their individual NEPA processes as cooperators.
Power Company of Wyoming
Provide Site-specific Plan of Development to BLM
Provide Eagle Take Permit Application to USFWS
BLM
USFWS
Site-specific NEPA Analysis (EA)
Coordinate as Cooperators
EIS on Eagle Take Permit Application
Decision Record
Record of Decision
Right-of-Way Grant
Eagle Take Permit
Concurrence
BLM Issues Notice to Proceed
High Desert District-Rawlins Field Office, Wyoming

Chokecherry and Sierra Madre
Wind Energy Project

BLM

High Desert District-Rawlins Field Office, Wyoming

Project Description

The Phase I Wind Turbine Development for the Chokecherry and Sierra Madre Wind Energy Project (CCSM) consists of 500 wind turbines along with associated facilities and infrastructure designed to provide approximately 1,500 megawatts (MW) of clean, renewable wind energy.

The Phase I Wind Turbine Development is located in the westernmost portions of the Chokecherry and Sierra Madre Wind Development Areas; each component has been micro-sited to avoid and minimize impacts to natural and cultural resources while maximizing the efficiency of the CCSM Project.

The Phase I Wind Turbine Development includes:

- 500 wind turbines
- Approximately 170 miles of access roads
- Approximately 65 miles of overhead collection and transmission lines
- Nine meteorological towers
- Two water stations
- Three long-term facilities:
    - Operations Center
    - Chokecherry Maintenance Building
    - Sierra Madre Maintenance Building
- Temporary facilities including the construction camp and laydown yards

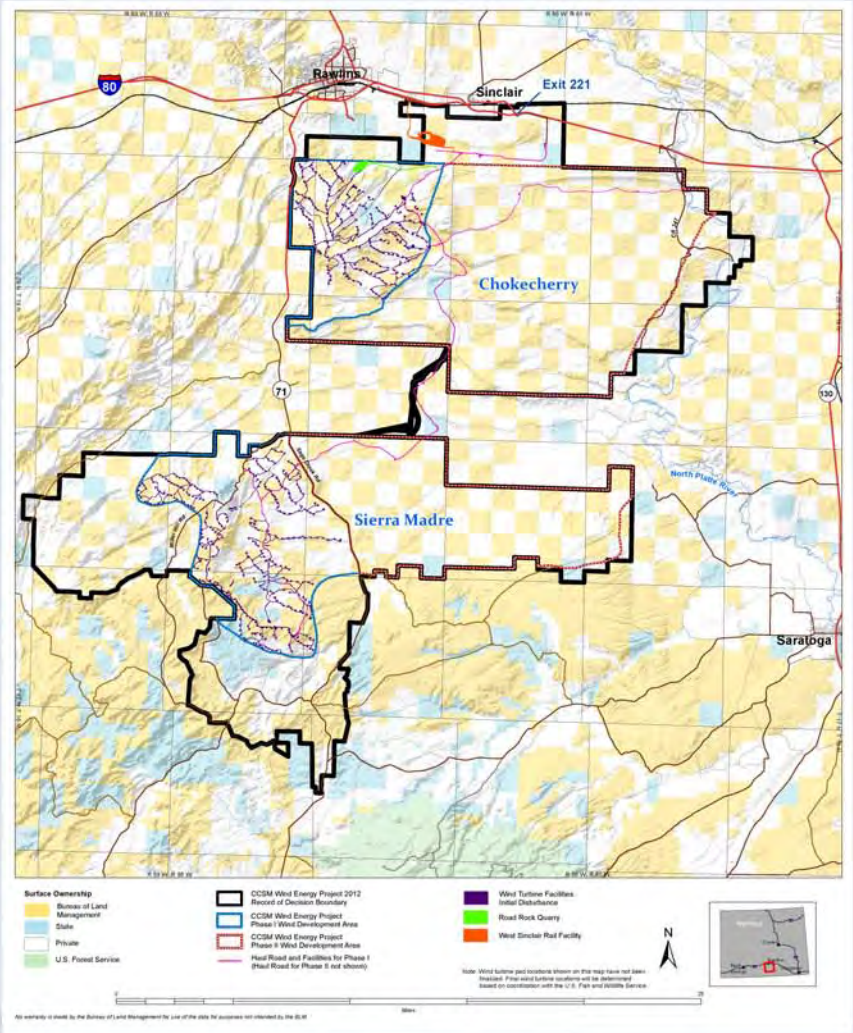
The long-term facilities are required to operate and maintain the CCSM Project, while the temporary facilities will be used to meet the CCSM Project needs during construction.

The initial disturbance for Phase I Wind Turbine Development would be approximately 3,441 acres and the long-term disturbance would be roughly 435 acres.

Chokecherry and Sierra Madre
Wind Energy Project

BLM

Chokecherry and Sierra Madre Wind Energy Project (CCSM) Phase I Wind Turbine Development



High Desert District–Rawlins Field Office, Wyoming

Chokecherry and Sierra Madre
Wind Energy Project

Phase I Wind Turbine Development

Scoping Meeting Registration Card

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

MEETING LOCATION AND DATE (CHECK ONE):
- ☐ RAWLINS MEETING DECEMBER 16, 2013
- ☐ SARATOGA MEETING DECEMBER 17, 2013

INTERESTED IN (CHECK ONE OR BOTH):
- ☐ BLM ENVIRONMENTAL ASSESSMENT
- ☐ USFWS ENVIRONMENTAL IMPACT STATEMENT

FIRST NAME MI LAST NAME

ORGANIZATION

MAILING ADDRESS

CITY STATE ZIP CODE

PHONE E-MAIL

☐ Yes, please include my name and address on the mailing list so I can receive information on the project.

Chokecherry and Sierra Madre
Wind Energy Project

Phase I Wind Turbine Development

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INTERESTED IN (CHECK ONE OR BOTH):
- ☐ BLM ENVIRONMENTAL ASSESSMENT
- ☐ USFWS ENVIRONMENTAL IMPACT STATEMENT

FIRST NAME MI LAST NAME

ORGANIZATION

MAILING ADDRESS

CITY STATE ZIP CODE

PHONE E-MAIL

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Chokecherry and Sierra Madre
Wind Energy Project

Phase I Wind Turbine Development

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Phase I Wind Turbine Development

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- ☐ SARATOGA MEETING DECEMBER 17, 2013

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FIRST NAME MI LAST NAME

ORGANIZATION

MAILING ADDRESS

CITY STATE ZIP CODE

PHONE E-MAIL

☐ Yes, please include my name and address on the mailing list so I can receive information on the project.

Chokecherry and Sierra Madre
Wind Energy Project

Public Scoping Meetings

Please join the Bureau of Land Management (BLM) and the U.S. Fish and Wildlife Service (USFWS) for two public scoping meetings providing information and seeking comments on the Phase I Wind Turbine Development for the Chokecherry and Sierra Madre Wind Energy Project (CCSM). The BLM is preparing a site-specific environmental assessment (EA). The USFWS is preparing an environmental impact statement (EIS) on Power Company of Wyoming's application for an eagle take permit. Joint public scoping meetings will be held on the following dates:

Monday, December 16, 2013

Jeffrey Center
315 W. Pine St.
Rawlins, WY

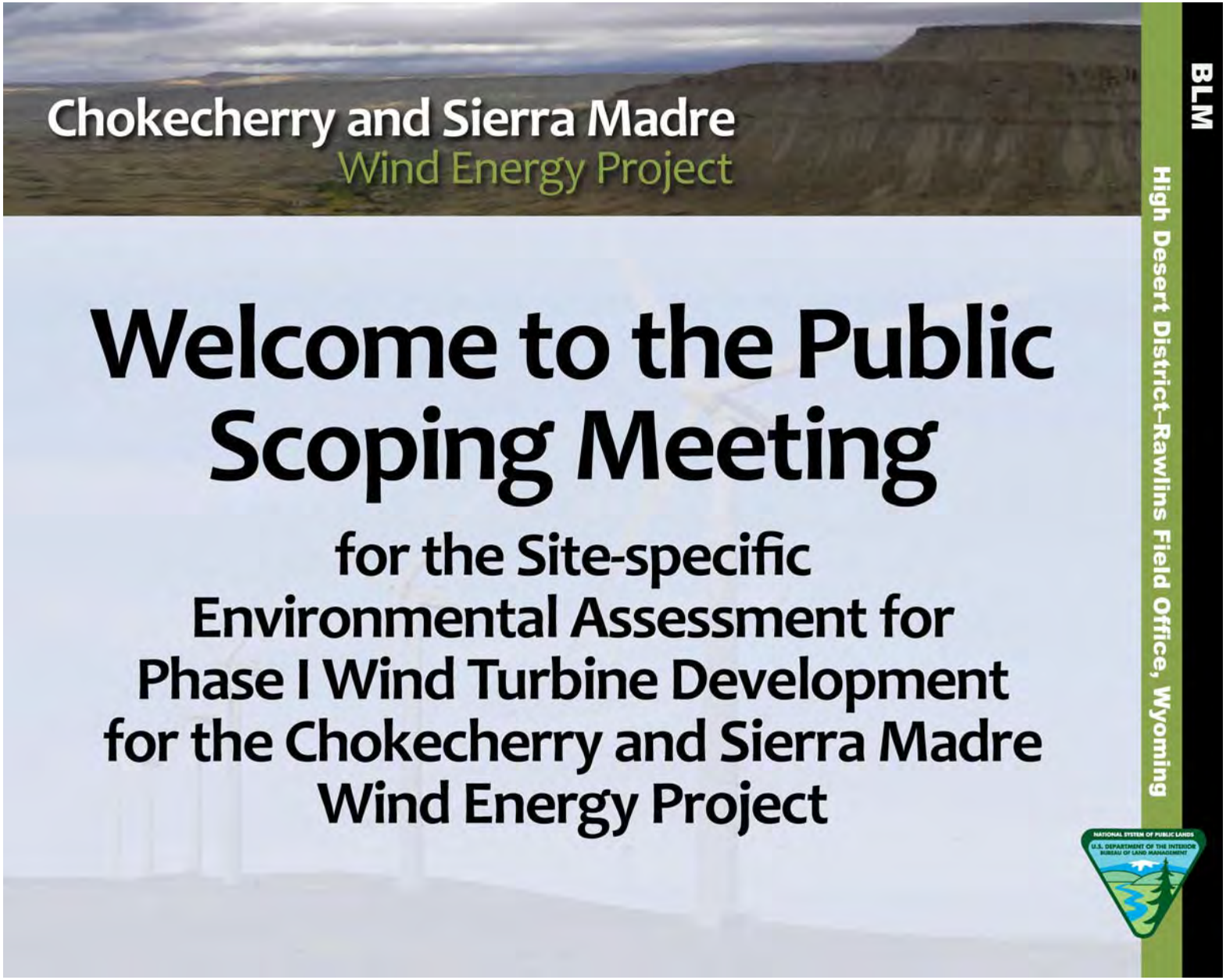
Tuesday, December 17, 2013

Platte Valley Community Center
210 W. Elm Ave.
Saratoga, WY

Meetings will be held from 4-6:30 p.m. with presentations at 4:30 and 5:30 p.m.

For additional information on the BLM EA process, please call: Heather Schultz at 307-328-4215
E-mail: blm_wy_pcw_windfarm@blm.gov
Project website: http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/Chokecherry.html

For additional information on the USFWS EIS process, please call: Michael Dixon at 303-236-8132
E-mail: ccsm_eis@fws.gov
Project website: http://www.fws.gov/mountain-prairie/wind/ChokecherrySierraMadre/index.html


Chokecherry and Sierra Madre
Wind Energy Project
Welcome to the Public
Scoping Meeting
for the Site-specific
Environmental Assessment for
Phase I Wind Turbine Development
for the Chokecherry and Sierra Madre
Wind Energy Project
BLM
High Desert District–Rawlins Field Office, Wyoming

Chokecherry and Sierra Madre Wind Energy Project

Environmental Assessment for Phase I Wind Turbine Development

Appendix C

Comprehensive List of Scoping Comments

APPENDIX C. COMPREHENSIVE LIST OF SCOPING COMMENTS

Table C-1 identifies the scoping comments the Bureau of Land Management received on the Chokecherry and Sierra Madre Wind Energy Project Phase I Wind Turbine Development Environmental Assessment.

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
01	1	We would request that you continue to strive to maintain general conformance with the locally adopted Land Use Plan and the approved Carbon County Conditional Use Permit, as promulgated in County Commissioner Resolution 2012-43 (recorded in book 1227, page 42) and in the Opinion of the Board of County Commissioners, Carbon County Wyoming Regarding the Decision to Approve the Conditional Use Permit-Commercial Wind Energy Facility, C.U.W. Case File #2012-01, rendered October 2, 2012.	Laws and Regulations
02	1	Carbon County requests that the conditions it has imposed on this project, contained in the above referenced Conditional Use Permit, be considered by the BLM in its ongoing analysis and any decision made with regard to this Environmental Assessment or the Right of Way Grant. Prior to any tower construction associated with this project, Caron County, as the local permitting authority, will be requiring building permits. As part of the building permit application review, Carbon County will be evaluating the permit applications to insure continued compliance with the previously issued Conditional Use Permit.	Laws and Regulations
03	2	The federal government and the State of Wyoming studies of this project are flawed, biased for the developer and not independent. Nowhere has the impact of the Atlantic Rim gas development been factored into this wind project's analysis; these two projects are within 15 - 20 miles from each other. A 2007 Record of Decision authorized multiple operators to develop the 270,000 acres of approximately 2,000 gas wells south of Rawlins, Wyo. Site-specific environmental assessments are conducted for each new development; however this wind project's proximity is not factored.	NEPA Process
04	2	As part of this discussion include a resolution of the sage grouse Endangered Species listing or their non-listing.	Wildlife Resources
05	2	Eagle kills would be severally reduced if project were moved to Bolten Flats.	Wildlife Resources
06	2	Has the impact of Atlantic Rim been factored into wintering elk at Red Rim (and their lichen deaths) with the Sierra Madre windmills? A recent BLM, WY Game and Fish, and University of WY study on pronghorn study notes the Atlantic Rim gas field development's impact on deer and elk; http://wyofile.com/kelsey-dayton/pronghornstudy/.	Wildlife Resources
07	2	Sage grouse issues and concerns have been glossed over by Wyoming Game and Fish: see the nesting grounds on Chokecherry project's wind development.	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
08	2	Until the recent eagle deaths in Utah are solved and mitigated do not issue a permit to kill eagles in the intermountain west, or anywhere.	Wildlife Resources
09	2	Require independent and verifiable eagle counts in the proposed area similar to the national survey by the BLM in Buffalo, WY who has volunteers assisting with eagle counts.	Wildlife Resources
10	2	The Sierra Madre rim has been locked for a number of years going overlooking Atlantic Rim and Bridger Pass; how can specific comments be made concerning that area if no access? How many windmills proposed on or just off the rim overlooking Bridger Pass, Atlantic Rim, Ferris/Green Mountains to the far North, the mountains in Northern Colorado, Elk Mtn/Snowy Range? A significant negative impact from that view point for the panoramic vistas.	Visual Resources Management
100	10	Unfortunately, an honest discussion of the true nature of that cost is not included in the CCSM Final Environmental Impact Statement (FEIS). The FEIS glosses over the potential for harm with vague promises of mitigation resulting from as yet to be developed wildlife protection plans.	Wildlife Resources
101	10	We urge BLM to complete this sage-grouse EIS before making additional commitments to permit CCSM. 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. Before BLM makes final decisions regarding pieces of CCSM, including the location of the turbines in Phase 1, we believe BLM must first determine whether the entire project site truly can accommodate 1,000 wind turbines. We believe 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.	Wildlife Resources
102	10	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. RMP FEIS at Map 2-54. 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.	Wildlife Resources
103	10	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 NEPA. We urge the agency to address these deficiencies before it makes additional commitments to CCSM.	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
104	11	We recommend the BLM support and consider the findings of on-going monitoring programs for sage-grouse, mule deer, raptors, aquatic resources, and other species as they develop site specific proposals for turbine placement throughout the Chokecherry/Sierra Madre proposal area defined in the EIS.	Wildlife Resources
105	12	some of the potentially affected environmental aspects identified and so effectively discussed in Chapter 3 of the FEIS do not receive comparable treatment in Chapter 4, Environmental Consequences, and are not discussed at all in the ROD. Therefore some of the issues, particularly socioeconomic issues, that have been raised by residents of the Upper North Platte Valley (UNPV) and (on their behalf) by Voices of the Valley, we believe have not been fully addressed. For example, the FEIS generally assumes that housing for incoming workers on the project can largely be provided by surplus temporary housing, including hotels, motels and parking units. However, there is no discussion in FEIS Chapter 4 of the potentially severe consequences this could have on the number one industry in the UNPV - tourism. Currently, the surplus in temporary housing counted on when the FEIS was completed has largely been consumed by other developments, creating an even larger problem for the project and residents in the affected area. This is only an example of socioeconomic issues that have been raised about the CCSM project, almost none of which receive any redress in Appendix D, BLM Environmental Constraints, Applicant Committed Measures, Applicant Committed Best Management Practices, and Proposed Mitigation Measures.	Socioeconomics
106	13	we continue to believe that the scope of this project precludes it from being adequately addressed by the National Historic Preservation Act alone. As the PA for this project acknowledges, NHPA can only address those properties that are eligible for the National Register of Historic Places. For a project such as CCSM, this is simply insufficient. The scale of this project will fundamentally alter the historic nature of Rawlins, Sinclair and the surrounding area, impacting cultural attributes that are not eligible for NRHP listing. This demands that these issues be addressed through the NEPA process, separate and apart from Section 106/NHPA. We expect to have additional opportunities to express these on-going concerns as the tiered NEPA documents are released.	Cultural Resources
107	13	However, in regards to this particular scoping document, AHW would note our dismay that the proposed siting of the turbines in the Sierra Madre area of Phase I are situated so close to the Pine Grove Stage Station, one of the most significant sites in the entire project area. This is of great concern to us since the BLM has still taken no steps to address our concern about the eligibility of listing the Pine Grove Stage Station on the National Register as a Rural Historic Landscape or similar landscape designation.	Cultural Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
108	13	Furthermore, as part of the Section 106 consultations for CCSM, the working group has agreed that the Pine Grove landscape should be evaluated for potential listing and has included this as proposed mitigation. However, discussions to finalize the mitigation plan have been in limbo for some time now. Without an agreed-upon mitigation plan in effect, and with proposed siting that would seriously compromise the setting of Pine Grove, AHW is very concerned that this siting plan has not properly or thoroughly considered this much discussed issue. Therefore, we urge you to reconsider the impacts this siting will have on the Pine Grove Stage Station and its landscape, especially in light of the general agreement to include this evaluation as mitigation but the on-going lack of an agreed-upon and finalized mitigation plan for this project.	Cultural Resources
109	13	We would also note that your timing on the release of this document and your public meetings to discuss it -- a week before Christmas -- hardly seems designed to maximize public input. We find that deeply regrettable, considering both the overwhelming scope and controversial nature of the project in question.	NEPA Process
11	2	Access has been denied for thirty plus years to most parts of this ranch from prior owners and impossible to make "site specific' comments....Was hunting allowed these past seasons? Given that access has been limited to only the couple of public roads on the Sierra Madre side- how can legitimate public comments be made to site specific areas?	Travel, Transportation, and Access
12	2	For detailed community factors appropriate dollar (relative to the size, scope, and cost of this project) donations should be required and not the dollar menu type of donations for a pet shelter or hot dogs for the high school prom. Estimated $2 billion dollar project requires a representative contribution back to the public from the developer before selling the developer an eagle kill permit.	Wildlife Resources
13	2	Last year's Powder River eagle survey, fifty-nine volunteers counted 310 eagles total, with 179 bald eagles. Since 2006, surveys began, a total of 2,042 eagles have been counted in that study area. In the late 1970's a national eagle study and survey was established by the National Wildlife Federation in order to develop the bald eagle winter population baseline for the continental US and to find additional winter habitats previously unknown. Since then this survey has been performed by the USGS and BLM. Has this type of analysis been performed to date for CCSM? Furthermore, the Cody BLM Office has been coordinating surveys in the Bighorn Basin since the late 1980s. Survey results start from the late 1970's to 2012 and are being used to determine bald eagle and golden eagle population trends. Given how long the CCSM project has been on the drawing board, how many Rawlins BLM Office studies have been conducted at CCSM; if so, where and when have the comprehensive results been announced?	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
14	2	What is the bottom line number to be accepted by the developer and government agencies, and at what price tag? Reference Duke Energy's $1 million fine for killing 14 eagles over three years; $71,000 per eagle with the other birds for free. Miller's plan of mitigation by setting aside land along the North Platte River requires review as that area has a Rochelle Fishing Easement designation of some fishing maps. If a fishing easement exists for access, can the area be considered 'set-aside' for an eagle refuge? Estimates of eagle deaths from wind turbines vary. A study published in 2013, six Fish and Wildlife Service researchers counted 85 bald and golden eagle deaths from 32 wind farms between 1997 and 2012 but said the number underrepresented the true total.	Wildlife Resources
15	2	If the developer/owner desire use the public's wildlife, including eagles; then the developer/landowner should provide like kind exchange opportunities and funding. These viewsheds and the wildlife will be impacted forever. For detailed community factors appropriate dollar (relative to the size, scope, and cost of this project) donations should be required and not the dollar menu type of donations for a pet shelter or hot dogs for the high school prom. Estimated $2 billion dollar project requires a representative contribution back to the public from the developer before selling the developer an eagle kill permit.	Wildlife Resources
16	2	The CCSM will incur a net loss and so will the surrounding area. This ecosystem will be negatively impacted by, BLM estimated, 46-64 eagles PER year. Developer proposes to offset these killings by reducing deaths elsewhere; where within a 100 mile radius of this project are 50 eagles killed per year? If such a place exists, then why hasn't it been retrofitted or mitigated? In a decade, one could expect 500 eagle kills for this wind farm on the Sierra Madre project alone; with 500 new eagles introduced/saved where? What is the expected impact to the environment without those 500 eagles over 10 years - will other eagles move in to replace or will they not locate in that area since the population is decreased? What other bird killing estimates are projected for this project?	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
17	2	Recommend Fish and Wildlife enact the following conditions to issue the eagle kill permit for this project: provide a strict and completely independent, highly qualified and trained third party (subject to frequent reviews and evaluation) for monitoring this whole project for eagle kills and other wildlife impacts with unfettered access or restrictions; an increasing payment schedule for the killing of eagles, more killed the higher the price paid per kill with punitive damages accessed after double or triple the expected kills happen on an annualized basis, these damages shared between local area wildlife conservation and environmental conservation groups for habitat restoration projects only; areas/towers incurring higher eagle kills, as independently confirmed, are idled during peak eagle killing season(s); if such site records a maximum number of kills the structure is relocated or removed from the landscape. Fish and Wildlife application processing and administration fees to be based upon the tax evaluation of the project at inception with an annual assessment levied based upon the total revenues, including tax rebates/credits, etc. (local/county/state(s) and federal) provided from the project over its operation and its existence. If towers/lines/roads (improvements) are removed then tax basis ceases. If project is abandoned, orphaned, or bankrupt then fees collected go to offset the deconstruction of the towers and lines killing eagles, etc.	Wildlife Resources
18	3	Who decides if measures are practicable? Will be different depending on who you ask. Do not consider allowing any eagle take. This project where on public land does meet public need because it's an expensive source of electricity, subsidized unnecessary and a waste of visual resource. The database on Bald Eagles will be very incomplete because of variable winter conditions that alter the number of migratory birds that show up year to year.	Wildlife Resources
19	4	There are BIRD FRIENDLY wind turbines available now.	Wildlife Resources
20	5	We remain concerned that the Chokecherry/Sierra Madre Project does not meet the Smart from the Start criteria, and we reiterate the concerns expressed in our protest of the Final EIS for the Chokecherry/Sierra Madre Wind Energy Project and incorporate them into these scoping comments by reference.	NEPA Process
21	5	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. Final EIS Vol. 2. at 4.14-20 and 4.12-23. We are concerned that the actual mortality level may be even higher.	Wildlife Resources
22	5	BLM should consider moving turbine arrays away from areas of concentrated raptor use, such as rims and canyon walls. A 50m setback is inadequate to prevent elevated levels of raptor mortality, as borne out in BLM's estimates of projected annual deaths. BLM should also consider keeping wind turbine arrays away from areas with abundant raptor prey, such as prairie dogs, ground squirrels, and sage-grouse.	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
23	5	BLM must disclose how Phase I will affect the viability of the area's golden eagle population. Golden eagles are the most common raptor using the area, according to BLM. Final EIS Vol. 2 at 3.14-11. Losing 46-64 eagles per year in such a slow-reproducing, territorial species that is already thinly distributed across the landscape could have major impacts on the local breeding population, as well as the population of migrants traveling seasonally through the project area. We are concerned the project area could turn into a population sink, killing more eagles than the area is able to replace.	Wildlife Resources
24	5	There are no proven methods of compensatory mitigation that can "replace" golden eagles lost to the Chokecherry/Sierra Madre wind turbines. The published literature contains little information or data to support the possibility of avoiding or minimizing impacts on golden eagles from wind turbines once they are constructed. Avoidance remains the best first step, according to U.S. Fish and Wildlife Service raptor experts.	Wildlife Resources
25	5	BLM has indicated that additional mitigation measures will be applied when reaching a certain threshold of raptor mortality. Final EIS Vol. 2 at 4.14-22. BLM must clarify what that threshold is, and what mitigation measures can be applied. By the time such a threshold is exceeded, it is likely the wind farm will be fully constructed and operational. Will BLM require the dismantling of wind turbine arrays or shutdown of turbines? The Phase I Development EA must disclose and evaluate the effectiveness of any mitigation measures to comply with NEPA. BLM should also disclose plans for the demobilization of turbines at the end of the project's life, and associated impacts with such demobilization.	Wildlife Resources
26	5	While the FWS considers whether a permit should be issued, the BLM should disclose and evaluate additional mitigation measures such a take permit might require, including 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.	Wildlife Resources
27	5	BLM must wait until FWS issues a take permit before it finalizes any further NEPA documents, like an EA for the Phase I development, in order to take a true "hard look" at the environmental impacts of proceeding with the Chokecherry/Sierra Madre Project.	Wildlife Resources
28	5	Levels of mortality that will trigger adaptive management have not been identified. The developer of this wind energy project would need to implement compensatory mitigation that numerically offsets predicted fatalities to result in a net take of zero in order to receive a programmatic take permit.3 Such measures need to be disclosed and fully evaluated during this NEPA process. Any further deferral would continue to evade NEPA's "hard look" requirement.	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
29	5	BLM must disclose what radar baseline information has been gathered regarding raptor flight patterns, particularly for ingress and egress to nest sites. If the Power Company of Wyoming ("PCW") or other private entities has this information, it should be shared with the BLM and the public before further proceeding with the Chokecherry/Sierra Madre Project. BLM previously conceded that baseline data gathering is still underway. Final EIS Vol. 2 at 4.14-22, 23. Neither an Avian Protection Plan nor the Eagle Conservation Plan was complete at the time of the Final EIS. Final EIS Vol. 2 at 4.14-22 and 25. Have they since been completed? BLM should defer further approval of site-specific activities until these data become available to the public and analysis is complete so turbine siting can be adjusted accordingly. Only then can the impacts of the project be properly evaluated through the NEPA process.	Wildlife Resources
30	5	BLM must clarify the extent to which sage-grouse core area designations changed in order to accommodate this project.	Wildlife Resources
31	5	BLM must disclose and evaluate the effectiveness of mitigation measures proposed for sage-grouse, including those it listed in the Final EIS, like bird diverters on met tower guy wires, marking fences, etc. Final EIS Vol. 2 at 4.15-15. These token measures do not mitigate the fundamental impact of the project—displacement of sage-grouse and subsequent population declines as noted above.	Wildlife Resources
32	5	BLM should gather and disclose full baseline information from lek counts and radio-telemetry outfitted birds, and then use that information to inform its NEPA process and analysis. Only then can the BLM properly develop and evaluate alternatives and impacts, and any specific mitigation measures and their effectiveness.	Wildlife Resources
33	5	The Rawlins RMP requires BLM to "maintain, restore, or enhance designated BLM State Sensitive Species habitat in order to prevent listing under the ESA." Final EIS Vol. 2 at 4.14-2. The Rawlins RMP also directs BLM to "sustain and optimize distribution and abundance of all native, desirable non-native, and Special Status species," as well as to "manage or restore habitat to conserve, recover, and maintain populations of native, desirable non-native, and Special Status species." Final EIS Vol. 2 at 4.14-3. BLM must explain how this project meets these requirements for the sage-grouse, a sensitive species. On its face, it does not appear possible for the level of impacts from the Phase I Development to meet these requirements.	Wildlife Resources
34	5	BLM failed to survey for pygmy rabbits or Wyoming pocket gophers before adopting the Final EIS. Final EIS Vol. 2 at 4.15-2, 3, and 9. Both species are BLM sensitive species with suitable habitat throughout the project area. Id. at 3.15-7 and Figure 3.15-2....In order to satisfy NEPA, BLM must gather baseline information on the distribution of these species in order to properly evaluate impacts that will occur to them, and disclose mitigation measures and their effectiveness.	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
35	5	BLM must fully consider the impacts to other species, including bats, which are particularly susceptible to wind turbine mortality. Impacts to big game, mountain plovers, prairie dogs, and other native species must also be fully considered and addressed, along with associated mitigation measures and those measures' effectiveness. Overall, we ask the BLM to clarify how the Phase I Development will comply with the Endangered Species Act, the Migratory Bird Treaty Act, and the Bald and Golden Eagle Protection Act, and other policies and regulations aimed at species protection and conservation.	Wildlife Resources
36	5	We were dismayed that the Final EIS for the Chokecherry/Sierra Madre Project did not evaluate any action alternatives that included less than 1,000 wind turbines. We ask the BLM to consider a reasonable range of alternatives in this Phase I Development EA that includes more than just a no action and single action alternative with one set number of wind turbines.	NEPA Process
37	5	Further, requirements included in a take permit from FWS may also warrant consideration of various numbers of turbines, as well as a reasonable range of array and siting alternatives. The BLM must serve a multiple-use mandate, and is not constrained to the project proponent's preference in this matter.	NEPA Process
38	5	BLM should consider an alternative that shields this wind farm from the Continental Divide National Scenic Trail and the Overland Historic Trail, especially with the Overland Trail under consideration for National Scenic Trail designation by Congress. BLM should consider an alternative that would preserve the features of the Overland Trail as they currently exist and not authorize action while the feasibility study for Congressional designation is underway. BLM should consider alternatives that use intervening topography to shield these trails and other viewsheds of sensitive areas for visual resource management. Such alternatives are fully reasonable and within NEPA's range of alternatives requirements.	Cultural Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
39	5	We were disappointed that the Visual Resources Management Plan Amendment adopted with the Final EIS did not adequately protect scenic viewsheds and historic and scenic trails. Going forward, BLM should evaluate and seek ways to protect recreation experiences dependent on visual resources and natural settings, including backpacking, hunting, fishing, photography, geologic and nature study, and hiking. Portions of the project area have a high visual sensitivity, including areas visible from the Continental Divide National Scenic Trail and the Overland Trail. Final EIS Vol. 2 at 3.12-2, 3, and 5. BLM must clarify how this project complies with the organic legislation for the Continental Divide National Scenic Trail, and does not preclude designation of the Overland Trail by Congress. BLM should fully consider impacts to these trails and recreation experiences, and consider alternatives to avoid or minimize such impacts. On its face, the Chokecherry/Sierra Madre Project will interfere with the nature and purposes of the Continental Divide National Scenic Trail. The trail was designated by Congress for its scenic qualities. Turbine visibility will be “high” for the trail, as well as the Overland Trail. Final EIS Figure 3.12-6. The visual contrast will be “strong.” Final EIS Vol. 2 at 4.12-13. BLM must clarify how this project complies with the Continental Divide National Scenic Trail Comprehensive Plan and the Rawlins RMP direction for the trail. BLM must also disclose and consider impacts to any wilderness characteristics found in the Phase I Development area, and ways to mitigate impacts to those characteristics.	Continental Divide National Scenic Trail
40	5	BLM must disclose impacts to historic and cultural properties and resources in the Phase I Development area, and disclose what steps have been taken to inventory resources for National Register of Historic Properties-eligible sites and trails and to comply with the National Historic Preservation Act. Without identification of such sites, BLM cannot properly evaluate impacts under NEPA's "hard look" requirement.	Cultural Resources
41	5	We also ask BLM disclose and analyze any impacts to Special Recreation Management and Wildlife Habitat Management Areas within the Phase I Development area, how those impacts comply with the Rawlins RMP, mitigation measures proposed for those areas, and those measures’ effectiveness.	Wildlife Resources
42	5	We ask BLM to fully consider the impacts of roads and access points necessary for various numbers of wind turbines and arrays, and make efforts to minimize such impacts on species habitat.	Travel, Transportation, and Access
43	5	BLM must fully evaluate the cumulative impacts of the Phase I Development with the TransWest Express transmission line and any other proposed or potential transmission infrastructure projects. Further, BLM must fully evaluate the cumulative impacts the Phase I Development will have on habitat, recreation, and visual resources along with oil and gas drilling impacts.	NEPA Process
44	5	We also ask BLM to disclose how the Phase I Development will comply with FLPMA’s requirement that BLM avoid unnecessary or undue degradation of resources, given the high level of impact to multiple resources expected from this project.	Laws and Regulations

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
45	6	We encourage the applicant, the BLM, and the U.S. Fish and Wildlife Service (FWS) to remain actively engaged as micro-siting decisions are made and to commit to a fully transparent process that includes making reports and data publicly available.	NEPA Process
46	6	We strongly urge that the review of the Phase 1 turbine siting, ECP, APP, and ETP be combined into one single NEPA process, with all draft documents and proposals examined simultaneously in one environmental impact statement (EIS). In California, BLM has pursued such an approach with the FWS as described in the attached 2013 Memorandum of Understanding (Attachment 3). This would provide the greatest opportunity for robust public engagement and informed decision-making, and provide maximum assurance that eagles and other wildlife are protected.	NEPA Process
47	6	Even if a combined approach is not pursued, BLM must fully consider the need to complete an EIS for the Phase 1 turbine siting. It is problematic to rely on an EA for the development of 500 turbines that have yet to undergo site-specific review because significant impacts are expected from such large-scale development and it is doubtful that the effects can be mitigated to a level of non-significance, and especially if BLM moves forward ahead of FWS' environmental review. It should be underscored that site-specific impacts were not analyzed in the 2012 Chokecherry Sierra Madre FEIS and Record of Decision.	NEPA Process
48	6	The projected impacts must be recognized and every effort made to avoid and minimize impacts, beginning with appropriate micro-siting and assurances of monitoring and adaptive management throughout the life of the project, as well as off-site mitigation.	NEPA Process
49	6	The 2012 Final EIS also stipulated that the BLM shall not authorize a Notice to Proceed until the FWS has evaluated the APP, which is to include the ECP, and determined adequacy to conserve sensitive species and ensure the preservation of eagles. Any determination of adequacy cannot be made prior to the full environmental review of significant components of the APP and the ECP (and it should be noted that drafts of these documents have yet to be provided to the public), and it is therefore unacceptable to propose finalization of the Phase 1 turbine layout environmental review in advance of the FWS's review of the ETP.	NEPA Process
50	6	The current environmental review process adopted by the BLM and FWS is procedurally problematic. The proposed process creates a bifurcated review of the Phase 1 EA and the eagle take permit (ETP) application, likely providing for finalization of the Phase I EA ahead of the complete analysis of: the Eagle Conservation Plan (ECP), significant components of the Avian Protection Plan (APP) and the ETP. This will result in a severely deficient and limited review of avian impacts and mitigation measure in the Phase 1 EA. There is similarly little guarantee that the mitigation measure proposed by FWS''s ETP review will be fully analyzed, incorporated, or even contemplated by the Phase 1 EA, as well as little assurance of a full public process throughout the decision making process.	NEPA Process

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
51	6	BLM must fully consider the need to complete an EIS for the Phase 1 turbine siting. It is problematic to rely on an EA for the development of 500 turbines that have yet to undergo site-specific review because significant impacts are expected from such large-scale development and it is doubtful that the effects can be mitigated to a level of non-significance, and especially if BLM moves forward ahead of FWS' environmental review. It should be underscored that site-specific impacts were not analyzed in the 2012 Chokecherry Sierra Madre FEIS and Record of Decision.	NEPA Process
52	6	The FWS has recognized the importance of adjusting turbine numbers and layouts to provide effective buffers for eagle and other raptor nest sites, as well as areas with high bird and bat utilization. BLM must therefore also provide an adequate environmental analysis of a full range of alternatives that will include a range of development scenarios including alternatives outside of the current Phase 1 plan of development, as well as various adjustments to turbine numbers and layouts.	Wildlife Resources
53	6	The BLM has committed to issuing a Determination of NEPA Adequacy (DNA) to change the EA/FONSI in the event that adjustments to turbine locations are necessary based on the ETP EIS. Such a process will not remedy the limitations of the proposed bifurcated review process, but in the event that a DNA is utilized, interested stakeholders and the public must be provided a clear, formal, and meaningful opportunity to engage in and comment on the adequacy and substance of the DNA and consideration of the potential need for a supplement to the environmental analysis should be fully considered.	NEPA Process
54	6	The proponents should be required to change out the turbines if technologies with significantly lower impacts to birds and bats become available.	Wildlife Resources
55	6	The BLM should avoid siting turbines in sensitive wildlife habitat.	Wildlife Resources
56	6	Efforts should be made to minimize disturbance during pre-construction and the area and intensity of disturbance should be minimized to the maximum extent possible during construction. Impacts should be monitored through the continued use of the avian radar technology in combination with traditional ground surveys.	Wildlife Resources
57	6	The turbines and transmission infrastructure should be sited away from high avian use areas and the flight zones between them. No lattice or structures that are attractive to birds for perching should be included in the facility designs.	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
58	6	We stress the need for continued monitoring to determine the impacts on sage-grouse. Given the uncertainty of the impacts of wind development on sage-grouse we recommend siting the turbines the farthest distance possible from the leks. Furthermore, spatial and seasonal buffers should be implemented to protect individual nest sites/territories and/or roost sites during construction, such as maintaining a buffer between activities and nests/communal roost sites and keeping natural areas between the project footprint and the nest site or communal roost by avoiding disturbance to natural landscapes.	Wildlife Resources
59	6	While we recognize that ultimately authority rests with FWS, the BLM and FWS should work together to ensure the ongoing protections of eagles, hawks, and raptors. Where land-based wind energy development is concerned, generally, the FWS has issued guidance to help identify, assess, and mitigate potential sources of impacts on wildlife in the U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines. In making the final siting decisions BLM should consider adherence to the recommendations in the guidelines, which may designate particular development areas as having a high or unacceptable risk to wildlife.	Wildlife Resources
60	6	While we recognize that the BLM is not the deciding entity for the ECP and issuance of the ETP, we strongly recommend that these documents be finalized prior to or concurrently with BLM's release of the final Phase 1 EA/FONSI. Furthermore, we recommend that both the BLM and the FWS take steps to avoid and minimize impacts on eagles, raptors, and sage-grouse. BLM has published a Draft Regional Mitigation Manual which includes requirements and guidance on off-site mitigation.	Wildlife Resources
61	6	Upfront mitigation is a positive step that paves the way for net conservation benefit; mitigation for mortality should provide benefits in advance of any mortality they compensate for, and increases in mitigation should be automatically triggered as needed. However, it must also be clearly articulated in the permit terms that the applicant is required to incorporate any new mitigation measures that are recommended by FWS to address mortality associated with the permit based on the latest science.	Wildlife Resources
62	6	More specifically, turbines should not be sited in areas where eagle prey species are abundant and turbines should avoid areas where active raptor nests have been identified.	Wildlife Resources
63	6	Issuance of the notice to proceed should be conditioned upon compliance with the following provisions: completion of the FWS Eagle Take Permit EIS; incorporation into the Phase I turbine siting EA of any changes in turbine location and number of turbines as stipulated in the FWS Eagle Take Permit EIS; and inclusion of wildlife survey and monitoring data in further NEPA analysis. The detailed data collected by the project proponent on greater sage-grouse, raptors, and other species of concerns should be fully considered in the EA. Stakeholders should be provided opportunities to engage in any further EAs, including scoping and draft EAs, as well as an opportunity to comment on any DNA that may be necessary.	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
64	6	Power pole retrofits are an inappropriate long-term mitigation strategy for wind projects because they are not additive. They are preventing electrocutions at power poles but not directly addressing take from wind projects, and it should be noted that FWS already has the authority to compel owners of power poles to retrofit them if eagle mortality has occurred. FWS must clearly articulate additional mitigation options that would not only attempt to offset eagle mortality at wind projects but also provide a net conservation benefit to the species. Additional recommendations include working with the Avian Power Line Interaction Committee to continue to work to reduce collisions, prevent bird electrocutions and collisions, and other protections.	Wildlife Resources
65	6	FWS should also examine the viability of a number of measures if accompanied by a scientifically defensible analysis of the population benefits to eagle populations in the local or regional area of the mortality. These include: - habitat improvements or protective measures for foraging and nesting habitat; - carcass removal; - additional wind project operational controls or curtailment; - funding for habitat restoration or minimizing activities with a demonstrated negative effect on golden eagle populations; - funding of programs to use rehabilitated eagles for Native American ceremonies instead of taking healthy eagles; and lead abatement programs.	Wildlife Resources
66	7	CDTC remains concerned that the project proposal risks the loss of protection of resources central to the Trail experience. We recommend the mapping of visual resources and the impacts to these resources should be done in a manner consistent with the Visual Resource Management System to adequately protect the integrity and quality of the scenic resources in the areas traversed or impacted by the identified project location. We also recommend that no changes be made to the visual resource management classes around the CDNST until the BLM VRM for Rawlins is amended to incorporate the CDNST Management Corridor.	Continental Divide National Scenic Trail
67	7	Most importantly, we highly encourage the review teams to continue to engage with CDTC and to identify these key areas and potential mitigation when the CDNST and its unique resources cannot be avoided.	Continental Divide National Scenic Trail

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
68	7	We recommend that the EA address mitigation to help alleviate direct, ancillary and cumulative impacts to the CDNST in identification of this potential wind energy development project. The section should address the need for both on-site and off-site enhancement to benefit the unavoidable scenery and Recreation Opportunity Spectrum setting effects on the CDNST and other National Scenic and Historic Trails. Potential mitigation to minimize impacts could be both on site and off site strategies and might include the following: 1. Funding for CDNST trail development and maintenance, corridor management, rights-of-way acquisition, and trailhead developments; 2. Removal of facilities that are no longer needed; 3. Relocation of existing smaller capacity transmission lines to the corridors identified by the EIS, and reclamation of those sites back to a natural state; 4. Careful review of the height and type of power line towers; 5. Careful location of power line towers so as to minimize their impacts; 6. Color and reflectivity of facilities; and 7. Landscape treatment within the right-of-way and at other places that screen structures.	Mitigation
69	7	CDTC would suggest that as part of mitigation, that the planning team consider relocation of portions of the CDNST along the areas south of Rawlins, in particular along the Bridger Pass Road and Muddy Creek Areas. In these cases, there are opportunities where relocation of the current CDNST would afford opportunities to use vegetation to screen impacts from the Sierra Madre Wind Farm project area all together, as well as create a better more highly desirable trail location.	Continental Divide National Scenic Trail
70	7	We feel strongly that this direction as expressed by the CDNST Comprehensive Plan and BLM Manual direction offers all administrative units responsible for managing the Trail the necessary information and direction to fulfill the intent of the National Trail System Act and will ensure consistent administrative treatment of the Trail's recreational, natural, and cultural resources.	Continental Divide National Scenic Trail
71	7	The location of the CDNST corridor bisects the southern portion of the Sierra Madre Project Area, because the CDNST is recognized as a special area, CDTC strongly encourages a review of the treatment of the CDNST to ensure the protection of the scenic qualities and visual resources in the affected project area (Sierra Madre Project Area).	Continental Divide National Scenic Trail

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
72	8	At a minimum, turbine site reclamation must meet the requirements of Appendix D of the FEIS with regards to soil stability, revegetation, and preventing the spread of invasive and noxious weeds. See also CCSM FEIS at 4.11-1-4.11-14. Further, and as discussed above, the BLM must coordinate with conservation districts and local counties, including members of the Coalition, to ensure that the specific sites as determined during the EA are reclaimed appropriately. However, the BLM must closely coordinate with local governments and conservation districts during the critical site characterization stage discussed in the Appendix D. See FEIS, App. D-4. The BLM should utilize the LSRCD and local governments to complete a pre-disturbance survey that accounts for both site-specific characteristics as well as larger regional concerns.	Reclamation
73	8	When selecting sites, the BLM must consider the layout of the entire site in order to locate roads, soil piles, transmission lines, and the actual turbine in a consolidated manner. See FEIS, App. D-8. For example, sites for stockpiling soil should be located near the area of disturbance to prevent unnecessary reclamation. The Coalition also notes the critical importance of maintaining the biological, chemical, and physical characteristics of suitable soils for reclamation. During the completion of the EA, the BLM must characterize “suitable” and “unsuitable” soils to prevent confusion by operators and contractors and thereby enhance reclamation efforts. The BLM should also allow for transporting suitable soils to different sites if necessary.	Soils
74	8	The EA must address how the CCSM project will be constructed and operated throughout the project life without interfering with grazing permits and allotments. The immediate and obvious concern is the four to five year construction period that will disrupt more than 4,000 acres. The BLM must fully develop a strategy to minimize local grazing operations that addresses access, vegetation, water sources, erosion, sage grouse and other wildlife habitat, and the combined effect the turbines will have on these factors. Less obvious are the impacts on rangeland conditions over the course of the project since approximately 435 acres will be permanently disturbed. The BLM must detail the long range impacts, both primary and secondary, of displacing lands that have been traditionally used for grazing and wildlife habitat. In that vein, all grazing permit holders and private land owners within the CCSM area should be included in planning meetings and notified of changes to plans.	Wildlife Resources

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
75	8	The CCSM project avoids sage-grouse core habitat areas, but the EA must still address methods to mitigate impacts on sage grouse, as almost all of the CCSM project still lies within sage-grouse habitat. BLM, CCSM FEIS at 4.15-12. Specifically, the BLM must evaluate the effects of added human presence in the area, the sage-grouse's adversity to tall vertical structures, increased predation from raptors that perch on power lines, increased habitat fragmentation and decreased forage. Id. Indeed, the USFWS recognizes these impacts as major threats to sage-grouse viability. Sage-grouse core habitat areas surround the CCSM project and sage grouse use the CCSM project area as well. BLM, CCSM Wind Energy Project: Greater Sage-Grouse Map available at: http://www.blm.gov/wy/st/en/info/NEPA/documents/rfo/Chokecherry/pub-mtg-docs.html. Moreover, the BLM must consider the indirect consequences of disturbing sage-grouse habitat such as the incidental effects on grazing, other important wildlife species, and landscape scale management efforts.	Wildlife Resources
76	8	the BLM must appropriately analyze the on-the- ground issues such as available housing for the work force necessary to complete the first phase of the development. The BLM's EA should consider temporary and permanent housing development. Relatedly, the BLM should also consider impacts on schools and public works, and the longevity of the local economies after the workforce has receded upon completion of the construction phase. Further, Sweetwater County will likely experience spillover from housing issues in Carbon County and the BLM should coordinate with all of the appropriate local governments to ensure that the project does not boom, then bust, the region. Id. at 4.8-19-4.8-23. Because the impacts will occur within a short period of time, the local governments must be included in any proposals considered for housing solutions early in the planning process to accommodate those needs. These services will be needed prior to any tax benefits from increased growth and development, if any, are realized.	Socioeconomics
77	8	The Coalition and LSRCD have several specific concerns with regards to the Reclamation Plan.	Reclamation
78	8	The Coalition and LSRCD support wind energy development, when it does not preclude other land uses or adversely impact other economic uses of the land. The CCSM may disturb substantial portions of the surface near the LSRCD and Sweetwater County. This may result in destruction of sage-grouse habitat, which contributed to its need to be listed, the spread of invasive and noxious weeds, which also impacts sage-grouse habitat as well as the livestock grazing industry, and may result in soil and water quality impacts. All of these concerns must be addressed in the EA, because the impacts extend far beyond the immediate project area.	Wildlife Resources
79	9	Please note, for the reasons described below, we believe that BLM must prepare a joint environmental impact statement ("EIS") with the U.S. Fish and Wildlife Service ("FWS") for Phase I rather than its current intent to prepare a separate "site-specific EA for Phase I."	NEPA Process

Table C-1. Scoping Comments Received

Comment Number	Document ID	Comment	Category Title
80	9	Given these potential impacts and the concerns we have previously raised in connection with the inadequacies of the FEIS, we again stress the urgent need for a more comprehensive and fully transparent approach going forward regarding the permitting and approval of Phase I. This includes meaningful and thorough analysis of impacts to sensitive species, as well as guaranteed opportunities for the public to understand and engage on monitoring, mitigation, and adaptive management prescriptions for the project.	NEPA Process
81	9	BLM should conduct a joint NEPA analysis with FWS that results in the issuance of one EIS that collectively evaluates both the ROW and the ITP.	NEPA Process
82	9	The BLM must delay its NEPA Analysis until the final ECP, APP, BPP, and any terms and conditions in the ITP can be fully incorporated into plans for Phase I.	NEPA Process
83	9	An EIS is warranted for Phase I as the "significant effects" of Phase I to bats, eagles, and other avian species "have not been analyzed in the project-wide level EIS" and there is significant uncertainty regarding whether they can ''be mitigated to a level of non-significance."	Wildlife Resources
84	9	BLM's NEPA Analysis must incorporate a broad statement of purpose and need for Phase I, consistent with the statutory authorities and policies applicable to the BLM - including its FLPMA obligation to minimize adverse impacts to wildlife when granting ROWs.	NEPA Process
85	9	BLM's NEPA Analysis must address how alternatives outside the scope of PCW's current plans for Phase I, including other project locations, reconfigurations, and reducing the number of turbines, might also address BLM's broad policies and statutory obligations.	NEPA Process
86	9	Cumulative impacts from the CCSM development must be adequately assessed as part of BLM's NEPA Analysis.	NEPA Process
87	9	BLM must provide assurances that adjacent lands will not be available to new significant development, as the size and nature of the CCSM development will cause considerable strain on the ability of the area's habitat to support healthy wildlife populations.	Wildlife Resources
88	9	BLM must pursue avoidance, minimization and mitigation measures that result in a net-benefit for sensitive and special status species and their habitats.	Wildlife Resources
89	9	All data used to support mitigation decisions must be published for public review and comment as early as practicable. This will provide stakeholders the opportunity to evaluate the effectiveness of the proposed mitigation.	Mitigation

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Comment Number	Document ID	Comment	Category Title
90	9	Continued survey effort is required to establish golden eagle use of proposed turbine locations and surrounding areas and to assess collision mortality risk. Specifically, pre-construction monitoring must extend 10 miles outside the CCSM boundary and include an adequate number of observation points to ensure the entire project area is evaluated. BLM must incorporate the specific mitigation recommendations identified above.	Wildlife Resources
91	9	BLM must work closely with FWS and WGFD to ensure that the ECP, APP, BPP and any applicable permits are based on adequate monitoring, sound science, and incorporate effective avoidance and minimization strategies to the extent practicable.	Wildlife Resources
92	9	BLM's NEPA Analysis must not be finalized until FWS has approved the final APP and BPP, and the public has had sufficient opportunity to review and comment.	NEPA Process
93	9	BLM must also ensure that the construction and operation of Phase I will comply with the MBTA.	Laws and Regulations
94	9	BLM must publish data from PCW's sage-grouse monitoring program and any other available data collected from the project area so stakeholders can evaluate sage-grouse activities and habitat use in the area. BLM must incorporate the specific mitigation recommendations for sage-grouse that are identified above.	Wildlife Resources
95	9	Until effective mitigation methods to offset sage-grouse habitat loss and disturbance are developed, avoidance of high quality habitat and identification and preservation of offsite, high quality sage-grouse habitat must be prioritized over the active management methods mentioned above.	Wildlife Resources
96	9	BLM must prohibit development in core/priority sage-grouse habitat that is not subject to a valid existing ROW. Where development is unavoidable in core/priority sage-grouse habitat due to valid existing rights, BLM must protect "active" and/or "unknown status" sage-grouse leks and associated nesting habitat with a 4-mile No Surface Occupancy (''NSO") buffer requirement. BLM must protect "active" and/or "unknown status" sage-grouse leks in noncore/general habitat with a 1-mile NSO buffer.	Wildlife Resources
97	9	Given potential impacts, there must be comprehensive post-construction monitoring that, at a minimum, is consistent with WEG requirements. BLM must identify specific, clear monitoring thresholds for wildlife impacts and define a process to require mandatory, robust management changes if thresholds are exceeded. This framework must include a defined transparent process for monitoring the effectiveness of mitigation measures and a process for public input that allows for future revisions of the conservation plans where warranted.	Wildlife Resources

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Comment Number	Document ID	Comment	Category Title
98	10	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 FEIS glosses over the potential for harm with vague promises of mitigation resulting from as yet to be developed wildlife protection plans.	Wildlife Resources
99	10	As we indicated in our comments on the previous scoping notice regarding environmental review of the haul road, the West Sinclair rail facility and rock quarry, 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 Resources